# INSTALLATION RESTORATION PROGRAM MANAGEMENT PLAN

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## INSTALLATION RESTORATION PROGRAM MANAGEMENT PLAN

#### PURPOSE

This document provides guidance on the management and execution of the Army's Active Sites Installation Restoration Program (IRP). It is designed to supplement the Department of Defense (DoD) Management Guidance for Execution of the Defense Environmental Restoration Program (DERP) and the U.S. Army Installation Restoration Program Guidance Manual. This management plan applies to activities that are located in the states of the U.S., the District of Columbia, and territories of the U.S. This guidance is not applicable to the Base Realignment and Closure (BRAC) program as funded by the Base Closure Account or the Formerly Used Defense Sites (FUDS) restoration program.

#### BACKGROUND

Defense Environmental Restoration Program. The DERP was formally established by Congress in 1984, Title 10 United States Code (USC) 2701 - 2707 and 2810. It provides centralized management for the cleanup of DoD hazardous waste sites consistent with the provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300) and Executive Order (EO) 12580, Superfund Implementation.

The DERP is funded by a special transfer account, the Defense Environmental Restoration Account (DERA) established by Section 211 of SARA, 10 USC 2703. The Office of the Deputy Under Secretary of Defense (Environmental Security), ODUSD(ES), centrally manages the account, including developing and defending the budget, and allocating funds among the Army, Navy, Air Force and Defense Agencies.

Installation Restoration Program. Under the DERP, the ODUSD(ES) has divided the IRP into four groups:

- -- Program Management and Support which encompasses management costs, eligible fines and penalties.
- --Hazardous and Petroleum Waste which covers the identification, investigation, and clean up of contamination at DoD installations to include petroleum, oil and lubricants and DoD unique materials such as biological and chemical warfare materials.

--Ordnance and Explosive Waste which identifies, investigates and removes DoD owned and abandoned ordnance which are a hazard to human safety. Without specific DoD approval, this group is limited to formerly used defense sites.

-- Technology demonstration and validation for fiscal year (FY) 1995 and FY96.

#### ARMY INSTALLATION RESTORATION PROGRAM OVERVIEW

The Army's IRP is a comprehensive program to identify, investigate and clean up contamination at active Army installations (including any off-post migration). Active installations are real properties within the United States owned by the Army. The program focuses on cleanup of contamination associated with past Army activities.

The <u>objective</u> of the IRP is to clean up contaminated sites with the following <u>goals</u>, 1) to protect the health and safety of installation personnel and the public, and 2) to restore the quality of the environment. To these ends, installations should perform only essential studies necessary to ascertain the need for remedial action, the preferred remedial alternative, and the means for implementation.

The IRP will be conducted consistent with the process described in the NCP, 40 CFR parts 300.61 through 300.70, and, if applicable, consistent with the substantive requirements of the Resource Conservation and Recovery Act (RCRA) corrective action process. The IRP will also comply with state, regional, and local requirements applicable to the cleanup of hazardous materials contamination, including related site safety and occupational health requirements and National Environmental Policy Act (NEPA) provisions.

At each phase of response, appropriate coordination must be conducted with federal, state, regional and local regulatory agencies. Interaction with regulatory agencies should be frequent and must include the Installation Commander (IC), or his/her representative, whenever possible.

The IRP will also include community relations activities during remedial response. Unless an emergency situation exists, as defined by the removal action criteria in the NCP, part 300.415(b)(2), the affected public will be afforded an opportunity to review and comment on any proposed remedial action, and comments will be considered prior to initiation of the action.

Overall, the Assistant Secretary of the Army (Installations, Logistics, and Environment) (ASA(IL&E)) through the Deputy Assistant Secretary of the Army (Environment, Safety, and Occupational Health) (DASA(ESOH)) has ultimate responsibility for all Army environmental programs, and overall policy and guidance authority concerning all Army environmental matters.

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The Assistant Chief of Staff for Installation Management (ACSIM), manages the Army's environmental program. The Director of Environmental Programs (DEP) and his/her staff support the ACSIM and review and provide recommendations on all submissions and responses directed to the ACSIM concerning environmental policies, planning, programming, budgeting, and oversight of the Army's environmental programs and related matters.

The Army Environmental Center (AEC) is a Field Operating Agency (FOA) of the ACSIM and is the Army's program manager for the IRP. As the program manager, AEC develops the IRP Work Plan and distributes DERA funds. AEC is the installation's advocate to ensure a quality product is received from the executor. AEC will conduct site visits to aid in the identification of requirements, examine the execution of ongoing projects, and to assist with communication and involvement of regulatory agencies and the AEC is available to support the installation in public meetings and interactions or negotiations with regulatory agencies. AEC will provide technical assistance with Defense Sites Environmental Restoration Tracking System (DSERTS) updates, RCS-1383 submissions, revisions to the Installation Action Plan (IAPs), and guidance in the overall IRP process. The IAPs, in conjunction with the installation obligation plans, will be used by the major Army commands (MACOMs) and AEC to oversee and track the progress of the IRP at each installation.

The IC is responsible for executing the IRP at his/her installation and is thus accountable for that portion of the IRP. The MACOMs are responsible for direction and management of the IRP for installations under their command.

#### PROGRAM MANAGEMENT AND DEVELOPMENT

#### Installation Action Plan (IAP)

The key document in the management of the IRP at active sites Army installations is the IAP. The IAP outlines the total multi-year integrated, coordinated approach to achieving an installation's environmental restoration goals. The plan is used to monitor requirements, schedules and tentative budgets as well as for responding to inquiries.

For each site within the Defense Sites Environmental Restoration Tracking System (DSERTS), the IAP documents all DERA eligible IRP requirements and outlines the rationale for the technical approach and corresponding financial requirements. Prior year funding and tentative cost estimates through the entire remedial process are included. Estimates of cost for out years must be fully supportable. The IAP contains the IRP program history, current DSERTS status, contaminants of concern, response actions taken, past milestones, and goals and schedules are presented, as well as any possible, current or future response actions. The contents of the IAP should match the RCS-1383s and DSERTS.

Each installation receiving DERA funds is required to prepare an IAP annually. Development and subsequent revisions of the IAP are the responsibility of the installation and must be signed by the IC. The commander's signature indicates review and approval of the document. IAPs are to be updated and submitted through the MACOMs to AEC in February of each FY.

The IAP is meant to be a "living document". Even though an installation is required to officially submit an approved IAP annually, the installation should update the plan whenever a change to the program occurs or as needed for presentation to regulators and interested public. At the direction of the IC only, the IAP may be distributed to regulators and/or the public to present the planned restoration activities for the installation.

It may not be necessary to prepare an IAP if an installation's only requirements in the Army IRP Work Plan are; (1) underground storage tank removals, (2) Federal Agency Hazardous Waste Compliance Docket requirements, or (3) remedial action operation or long-term monitoring requirements. IAP guidance, prepared by the AEC, lists installations required to prepare an action plan.

Guidance for preparation of IAPs is contained in the 6 Dec 94 memorandum from AEC, subject: FY95 Guidance for Required Installation Action Plans.

Environmental, Pollution Prevention, Control and Abatement Report Control Symbol DD-P&L(SA) 1383 (OMB A-106 Report) (RCS-1383s)

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The RCS-1383 identifies all Army environmental program requirements for inclusion in the annual Office of Management and Budget (OMB) Circular A-106 report. The report tracks these requirements as identified, programmed and budgeted, as well as the actual obligations incurred during execution. The RCS-1383 data base is a valuable management tool and, in addition to the one-time required submission in the Spring (May) of each fiscal year (FY), should be updated on a continuing basis.

The RCS-1383 is also the vehicle to request funding for DERA eligible environmental projects. As requested from the installation, project executors will support the installation in preparing schedules and cost estimates for use in the RCS-1383 submission and updates. It is highly recommended that the MACOMS hold line item reviews with each installation and their executor(s) to review the DERA eligible submissions.

Qualifications for projects eligible to receive DERA funding under the Army IRP are listed in Army Regulation (AR) 200-1, Environmental Quality, Environmental Protection and Enhancement, Chapter 9 and the Management Guidance for Execution of the FY 94/95 and Development of the FY96 Defense Environmental Restoration Program.

Attachment A of this management plan presents specific activities eligible and not eligible for DERA funds under the IRP taken from the Management Guidance for Execution of the FY 94/95 and Development of the FY96 Defense Environmental Restoration Program.

For detailed guidance on the RCS-1383 submission, see the Policy and Guidance for Identifying U.S. Army Environmental Program Requirements, Volume II, dated July 1993. Appendix K of this document pertains specifically to restoration. Appendix K was recently updated and the revised appendix can be found as Attachment B to this guidance.

## Defense Sites Environmental Restoration Tracking System (DSERTS)

The DSERTS is a personal computer program used by installation and command restoration program managers for the collecting and reporting of information on the Defense Environmental Cleanup Program(s) (Installation Restoration and Base Realignment and Closure). Version 1.0 of the DSERTS software was fielded in Apr 94 and version 1.1 was distributed in Oct 94.

The information collected with DSERTS is transferred to the DoD Restoration Management Information System (RMIS). The RMIS is used by the DoD to provide program status for the Defense Environmental Cleanup Program Annual Report to Congress. The Army uses the DSERTS to report restoration program status at DOD in-progress-reviews, sites addressed in the IAP and BRAC Cleanup Plan (BCP), and other program status briefings.

DSERTS data calls are in the spring (April) and fall (October) of each year. The DSERTS software, datafile(s), User Guide, and Guidance Manual, are provided to each installation. MACOMs are requested to task the IC to review, update and submit their DSERTS data in order to meet suspense dates. Installations can request assistance from the AEC or Corps of Engineers Project Managers. Recommend that installations contact the AEC if out-of-cycle DSERTS updates are needed. Unless the MACOM notifies AEC, in writing, that the installation will provide a DSERTS update to AEC, data submissions will only be accepted from the MACOM.

The DSERTS data is reviewed at the AEC to ensure completeness and consistency with guidance. Any necessary revisions are coordinated with the installation or MACOM.

For additional DSERTS information see the DSERTS software on-screen Help, the DSERTS User's Guide, Sep 1994 and the DSERTS Army Guidance Manual, Sep 1994.

### Relative Risk Site Evaluations (RRSEs)

In November, 1993, the ODUSD (ES) committed the DoD to pursue using risk to establish restoration goals and activities in the DERP. The "Management Guidance for Execution of the FY94/95 and Development of the FY96 Defense Environmental Restoration Program (14 Apr 1994)", required that the services establish a common framework in FY95 to build the FY96 program based on a relative risk management concept. An interservice group within DoD comprised of representatives from the Army, Navy, Air Force, and Defense Logistics Agency, developed the Relative Risk Site

Evaluation framework and issued a primer which provides instructions to implement the relative risk management concept described in the DoD guidance. Use of common standards and associated rating definitions in the RRSE for all military services ensures a common categorization method DoD-wide.

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RRSE Framework. The RRSE is a programmatic tool used to ensure that restoration work across DoD is generally sequenced first at those sites that pose the most risk to human health and the environment. The RRSE is not a substitute for either a baseline risk assessment or health assessment, nor is it a means of placing sites into a "no further action" category.

The categorization of IRP sites into relative risk groups is based on an evaluation of contaminants, pathways, and human and ecological receptors in ground water, surface water, sediment and surface soils. Each of these environmental media are evaluated using three factors:

- o Contaminant Hazard Factor -- a comparison of contaminant concentrations to risk based standards in a given environmental medium
- o Migration Pathway Factor -- a measure of the movement or potential movement of contamination away from the original source
- o Receptor Factor -- an indication of the potential for human or ecological contact with site contamination.

Evaluations of these three factors at a site are combined to place the site in an overall category of "high", "medium" or "low" relative risk. Once relative risk evaluations are made for each site(s), the sites within each category are further divided into those with or without firm schedule milestones in regulatory agreements.

- o Priority 1A -- High relative risk sites with regulatory agreements/order.
- o Priority 1B -- High relative risk sites without regulatory agreements/order.
- o Priority 2A -- Medium relative risk sites with regulatory agreements/order.
- o Priority 2B -- Medium relative risk sites without regulatory agreement/order.
- o Priority 3A -- Low relative risk sites with regulatory agreements/order.
- o Priority 3B -- Low relative risk sites without regulatory agreement/order.

Installation Responsibility. RRSEs are required for all sites in the IRP based on available site data. Each installation is responsible for performing a RRSE for each DSERTS site which has available data and requires further response as well as funding. Installations are to complete RRSEs using a DSERTS module (available May 1995) and all submissions to AEC are to be coordinated through the MACOMs. Sites lacking sufficient information for the conduct of a RRSE should be given a "Not Evaluated" designation. Any site within the RI/FS phase should have available data and be evaluated for relative risk and any site in the remedial action phase must be evaluated. If an installation submits a "Not Evaluated" designation for sites in a phase where data should be available, the site will be flagged and IRP programming will be evaluated by AEC.

Installations are responsible for submitting RRSE data to AEC twice a year. In order to provide RRSE results with the budget submission, RRSE data is to be provided to AEC with the Spring RCS-1383 submission. RRSE data is also required in the Fall to document cleanup progress during the previous FY.

Individual RRSE results should be incorporated in the IAP. Also, per DoD guidance and Army policy, installations are to solicit stakeholder involvement in the RRSE process. The IAPs, the RRSE process, together with the resultant evaluations can serve as the basis for dialogue with stakeholders (the local community, the public and regulator representatives) on sequencing work at sites.

AEC Responsibility. AEC is responsible for collecting and reviewing individual RRSEs for each installation within the Army. Once the data is received from the installations, AEC performs quality control and quality assurance on individual evaluations. AEC consolidates all RRSE data and represents the Army at the DoD-wide reviews.

Based on the Spring RRSE data, AEC is responsible for incorporating the RRSE results into the budget submission.

When an installation decides to involve the public and stakeholders in the RRSE process, AEC is available to provide assistance with technical and informational briefings.

For detailed guidance on the RRSE, see 6 Sep 94 memorandum from AEC, - subject: Relative Risk Site Evaluation Worksheets and the Relative Risk Site Evaluation Primer, ODUSD(ES), Summer 1994 (Interim Edition).

#### IRP Work Plan

Per AR 200-1, the AEC uses the RCS-1383 to develop an annual IRP Work Plan and a report of the next seven (7) fiscal year IRP requirements. The IRP Work Plan is a prioritized listing of the total active sites Army DERA eligible requirements.

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The IRP Work Plan is a detailed project listing which includes:

- project name
- funding requirements (estimates must be fully supportable)
- project phase
- executing agency
- award status
- project priority
- RCS-1383 number

Review of RCS-1383 Submittals. The information contained in the IRP Work Plan is obtained directly from the most recent RCS-1383 submission. AEC will ensure that all input from the installation RCS-1383 requesting DERA funds is verified and accounted for in the IRP Work Plan. There is one official submission of the RCS-1383 submission in May of each year. Out of cycle RCS-1383s for DERA eligible projects will be accepted by AEC from the MACOM.

RCS-1383s requiring clarification will be flagged and returned to the appropriate MACOM for necessary action. All responses must be returned to AEC by the MACOM within two weeks of notification.

Data Entry. To build the IRP Work Plan, the following information from the RCS-1383 is used:

- Project name It is recommended that the project phase not be included as part of the project name.
- Current year funding This funding requirement should be coordinated with the project executor(s)
- Funding for outyears Projected funding should be estimated for the life of the project. Projections should be made with the assistance of the project executor(s)
- Narrative The narrative must provide enough information to 1) support the designated compliance status, 2) correctly prioritize the project (to include relative risk determination), 3) determine the project phase for the current year and next fiscal year, 4) identify quarter of execution, 5) identify the executor, 6) break out prior year contract administration, and 7) identify all DSERTS sites.

The executor for each project listed in the current FY and FY+1 IRP Work Plans must be identified in the narrative of the RCS-1383 and will be reflected on the IRP Work Plans. Prior to submission of RCS-1383s, installations must request services from the preferred executor in writing and receive written confirmation from the executor for FY+1 projects. RCS-1383s that do not identify an executor will be flagged and returned to the MACOM for resolution.

The following RCS-1383 information is also reviewed for accuracy and completeness:

- Pillar This field must be "RST" when requesting DERA funding
- Point of contact (POC) This should be the person at the installation knowledgeable about the IRP.

More detailed guidance on RCS-1383 preparation is in Attachment B to this management plan; revised Appendix K of Policy and Guidance for Identifying U.S. Army Environmental Program Requirements, Volume II, July 1993.

Prioritization. Within the framework provided by DoD, the Army has developed a priority system to fund DERA eligible activities at installations by ranking projects according to a "worst first" policy. To allow for equitable funding distribution, the priority system is based on individual IRP projects at an installation rather than the collective IRP requirements for each installation. This priority system, which was first developed in 1990, is coordinated with the MACOMs and is continually evaluated and updated.

Based on information contained in the narrative portion of the RCS-1383 submission, AEC assigns a priority code to DERA eligible projects. Emphasis is placed on actions protecting human health and critical environments from imminent endangerment and on actual remediation efforts. Installations are notified of the priority of a project in the IRP Work Plan. Distribution of the IRP Work Plan to the installation is the responsibility of the MACOM.

Priority sort definitions are included in Attachment B to this management plan.

Execution Strategy. The Army's execution strategy for FY95 is to have the majority (90%), if not all, of the program executed by the end of the third quarter. To meet this goal all projects identified for fourth quarter execution (or if no quarter for execution is identified) will be placed below both the "cutline" and the "execution line" and will be evaluated as the year progresses. Once the Army has developed the IRP Work Plan, a prioritized list of projects, the current FY budget guidance for the DERA determines where the "cut-line" falls on the IRP Work The Army's strategy to execute the FY95 budget is to open the IRP Work Plan for execution of all projects with a priority sort (PS) code A through and including k (Imminent threat to human health through compliance with state laws or requirements). Projects above the execution line are eligible for funding on a first come-first serve basis until funds are depleted. Remaining projects are moved to the next FY and should be first quarter award projects. All DOD priority 1 projects identified as fourth quarter awards will be given a PS code of "1" and will be eligible to receive finds for scoping. Should fourth quarter funds be available, these projects will be ready for execution. If funds are not available, these projects will be ready for first quarter execution.

No installation will receive more than 10% of the approved Army Active Sites DERA without explicit approval of the ACSIM and the DASA(ESOH). Justification for additional funding must be made in writing to the AEC, who will forward the request for approval.

Review and Approval. The IRP Work Plan is a dynamic document. As execution of the IRP occurs, the IRP Work Plan becomes a mixture of estimated requirements and actual obligations. Also, the IRP Work Plan continually captures emerging requirements, deferred/deleted requirements, and changes in project priorities.

FY + 1 work plans are developed in the Spring using the RCS-1383 submission. This work plan is distributed to the MACOMs for review and comment. Comments and revisions are presented at the work plan review sessions which are held four (4) times per year; one meeting in November, after the close-out of the previous FY and approval of the current FY budget level has been received from Congress, one meeting in February, one in May after the RCS-1383 submission, and the last meeting in late June or early July.

The work plan review session provides MACOMs with the opportunity to request changes in funding level or priority for projects at their installations. It is the responsibility of the MACOMs to coordinate with their installations and to request proposed changes to the IRP Work Plan at these review sessions. In addition, MACOMs shall provide information regarding award status and executability of all projects.

A week before the scheduled work plan review session, the MACOMS will provide AEC a list of changes to the IRP Work Plan for each installation. This list should be in the form of a spreadsheet and will be reviewed by AEC (Resource Management Branch and Program Management Branch) prior to the work plan review session. The objective of providing changes before the actual work plan review session is to expedite review of minor, acceptable changes allowing for focus on major changes and problems.

An example format for IRP Work Plan changes is attached as Attachment C to this management plan.

All requests for changes to an approved IRP Work Plan must be initiated by the installation and submitted through the MACOM to AEC. The MACOM must include justification for the requested change. Changes less than \$200K will be reviewed by AEC, Chief, Installation Restoration Division (C,IRD). Requests for changes greater than \$200K will be forwarded, with assessment of impact to the program, to Commander, AEC for review. All responses will be provided to the MACOM.

The initial and revised IRP Work Plans are briefed to the ACSIM and the DEP for approval. Only the initial work plan is briefed to the DASA(ESOH) for concurrence. Following approval/concurrence, the work plans are disseminated to the MACOMs and represent the current guide for execution of the IRP.

The following describes the typical life cycle of the FY/FY+1 work plans:

- -- Feb work plan review meeting
- -- Mar revisions per comments from Feb work plan review meeting incorporated. Approved FY/approved DRAFT FY+1 (PLANNING ONLY) to field
- -- May 15 Annual RCS-1383 submission
- -- May work plan review meeting
- -- Jun revised FY/revised FY+1 to field for review
- -- Jun/Jul work plan review meeting
- -- Jul revision, final approved FY/initial approved FY+1 to field
- -- Aug/Sep obligation plans for FY+1 due to SFIM-AEC-RMB
- -- Sep work plan provides input for the President's budget
- -- Oct end of year (EOY) close out

- -- Nov work plan review meeting discuss EOY obligations, 1Q execution, actual program allocation
  - -- Dec Current year work plan revised, approved, distributed

#### Performance Measures

DoD In-Progress Review. ODUSD (ES) requires that DoD components monitor program progress and report quarterly. When RCS-1383 are submitted in the Spring of each FY by the MACOMs, a project status summary must also be submitted to AEC for each project with a requirement at or exceeding 2 million dollars. The Army also uses DSERTS information to report DERP status at quarterly DoD In-Progress-Reviews.

Updates of the project status summary sheet are required from the MACOM when changes in project status occurs or if or when a project meets the 2 million dollar threshold. These updates should be submitted to AEC along with the revised RCS-1383.

The standard format for DoD In-Progress Review Project Status Summary is presented as Attachment D to this guidance.

The Defense Environmental Cleanup Program Annual Report to Congress. The DoD is required to submit an annual Report to Congress that describes the DERP (IRP and BRAC) accomplishments during the previous FY. The report is required by section 120(e)(5) of SARA which applies to all Federal facilities and section 211 of SARA, as amended on 10 Nov 93, which pertains to The report outlines progress made in carrying out environmental restoration activities at military installations. Included in the report are Success Stories highlighting significant DERP activities and initiatives, narrative summaries for NPL, proposed NPL, and major BRAC installations, and the status of the cleanup at installations with sites in the DERP. MACOMs are requested to submit Success Story candidates to AEC and are encouraged to notify AEC on possible Success Stories as they are occurring. MACOMs are also requested to prepare or review narrative summaries and ensure that the DSERTS is updated and submitted as required. The DSERTS is a critical source of information for the report. Preparation of the report begins in September of each year with distribution to Congress and the public by 31 Mar. Copies of the report are also distributed to MACOMs, ICs, and program executors.

## Defense Environmental Network and Information Exchange (DENIX)

DENIX is an electronic communication tool that enables Army IRP personnel to exchange information. The information exchanged through DENIX includes electronic mail, announcements, data files, reports, legislative and regulatory alerts, listings of environmental training courses, seminars, and conferences, and on-line environmental publications. DENIX is available to all DoD military and civilians involved in the environmental security arena.

The current approved IRP Work Plan can be obtained electronically from the DENIX, however the entire IRP Work Plan is not available to all DENIX users.

Information on how to gain access to DENIX can be obtained from the DENIX hotline (217) 373-4519.

## PROGRAM EXECUTION

## Responsibility

Since the IC is ultimately accountable for the IRP at his/her installation, the Commander will assume responsibility for execution of the restoration program. This policy provides the IC, with MACOM concurrence, the option of determining the performer(s) for executing the IRP.

The two main executors of the Army IRP include the AEC and the U.S. Army Corps of Engineers (USACE). As a general rule, AEC executes all pre-design actions for NPL installations and the USACE divisions/districts executes other pre-design responses and all remedial actions. The USACE has established Hazardous, Toxic and Radiologic Waste (HTRW) Design Districts for executing Army IRP activities. Each HTRW Design District works within specific geographic boundaries and every active sites Army installation is supported by a geographically designated HTRW Design District. Approval must be obtained from the Director of Military Programs at headquarters USACE if the installation would like to use a USACE District outside of the designated geographic boundary for Use of government agencies outside of the Army to that District. execute the IRP is discouraged except under unusual circumstances. As appropriate, Economy Act procedures will be followed.

If the IC believes the executor's performance is unsatisfactory, the IC should contact the commander of the executing agency and attempt to resolve the issues. Performance should be judged on the executor's ability to meet schedules, communicate with the installation staff, provide quality reports, effectively use available funding resources, etc. If the quality of performance by the executor continues to be unsatisfactory, the IC, in concurrence with the MACOM, may transfer execution to another performer. Appropriate notifications shall be made to the executor, MACOM, and AEC so that funds can be recovered and redirected to the new performer.

Memorandum of Agreement. As a measure to avoid any dispute between installation and executor, it is suggested that installations and executors identify the roles and responsibilities for cooperation and extent of support which the executor will provide the installation by entering into a Memorandum of Agreement.

A suggested generic Memorandum of Agreement is at Attachment E to this management plan.

Oversight Program Management. As the Army's IRP program manager, the AEC has an oversight function for all active sites Army installations. AEC will conduct site visits to assure that the IRP is being conducted in accordance with DoD and Army policy and guidance, provide quality assurance and quality control (QA/QC) and concurrence of all funding requests, provide technical assistance and guidance in the overall IRP process. IRP project documents should be provided to the AEC oversight project manger. When documents are finalized, AEC will submit copies to the Technical Information Center (TIC). If an installation is not aware of their oversight project manager, contact the Program Management Branch of AEC, IR Division, DSN 584-2270 or commercial (410) 671-2270.

#### Funds Flow

As the Army's program manager for the IRP, distribution of all DERA funds for the IRP are managed by AEC. The funds are distributed to installations and executors in accordance with DERA eligibility guidelines, approved work plans, obligation plans and funding requests as directed by the MACOM.

Funding Requests. In coordination with the executor, the Installations will prepare and sign a request for DERA-eligible funding for tasks that are approved for execution in the latest approved IRP Work Plan and are ready for execution. The installation will then forward the request to their MACOM. The MACOM in turn will review the document and concur/non-concur with the request. All concurred requests will then be forwarded directly to AEC's Resource Management Division. At AEC, QA/QC of each funding request will be accomplished and the funds distributed as indicated on the request. Any funding request that is rejected by AEC will be returned to the MACOM for appropriate resolution along with the reason for rejection.

Funding Request Requirements. Each funding request must have the RCS-1383 number, the IRP Work Plan line number (with approved work plan date), the Work Plan Project Identification number and the phase of the project. Point of contact (POC) information and contract information must be provided as well as identification of the amount of funds for the contract, contract administration (to include Supervision and Administration (S&A) and Supervision and Review (S&R) and/or in-house work.

The "Summary Statement of Work" should be a brief description of the use of the funds, not a general description of the total project. For example, if a request is for a contract, the summary statement of work could be "Contract award for RI at 10 sites". If the funds are for contract administration of a prior year contract, the summary statement of work would be "Prior year contract administration costs for contract number... awarded in Oct 1992 for RI at 10 sites". If the request is for in-house

QA/QC costs associated with a remedial action, the summary statement of work could be "In-house laboratory costs associated with QA/QC of soil and ground-water sampling for a contracted landfill remedial action".

The "Summary Government Cost Estimate" should reflect costs based on the latest available data associated with the funds being requested. If the request is for a contract, the summary should include total estimated labor, overhead, sub-contract, other direct costs and fees. If the request is for in-house costs, reflect the estimated labor, overhead and other associated costs. Summary government cost estimates should indicate if the request is only for a partial amount of the total line item in the IRP Work Plan, i.e. the line item is for \$100K, the request is for \$40K (in-house) and the remaining \$60K will be needed later.

The "Justification for Differences" must be completed anytime there is 1) an increase in the amount requested and the amount in the approved IRP Work Plan, 2) a request for funds not on the approved IRP Work Plan, 3) a difference between the project phase on the funding request and the approved IRP Work Plan and 4) a request for funds with a change in the Priority Code. The justification must be clear and concise and related to the difference. Each request for funds that is not on the approved IRP Work Plan must have a RCS-1383 attached.

Funding Threshold Requests. For projects involving a contract, installations can initiate requests authorizing a funding threshold. These requests must be submitted through normal channels by the fifth working day of the month in which the contract is expected to be awarded. It must be noted on the request that this is a threshold request for approval and the estimated date of negotiation should be provided. This threshold request should be based on the most recent Independent Government Cost Estimate and not on the amount in the latest IRP Work Plan.

MACOMs will concur/nonconcur with the request for presumptive approval and any reprogramming action, as necessary. AEC will accomplish the QA/QC on these requests, reprogram (if necessary), and hold the requests (not the funds) in suspense until ready to award. At the point of award, the MACOM, installation or executing POC will contact AEC Resource Management Division with the negotiated award amount. AEC will then issue the funds or approve issuance of funds, as indicated on the request.

The standard format for a Funds Request is presented as Attachment F to this management plan.

Reprogramming. When there is a difference between the approved IRP Work Plan and the funding request that includes an increase in cost (to include new projects) or change in priority code, the line item in the approved IRP Work Plan must be reprogrammed. Reprogramming actions are approved at different levels within the Army, depending on the amount of the increase. The funding request must have a clear and concise justification to be forwarded with the request for reprogramming approval. Funds will not be released until all approvals and reprogramming are accomplished.

Obligation Plans. After distribution of the fourth quarter approved FY+1 IRP Work Plan (July-Aug), installations are required to provide a month-by-month obligation plan for all projects in that plan. Plans are to be submitted by the MACOMS to AEC, ATTN: SFIM-AEC-RMB. Information provided in the obligation plan provides input for Continuing Resolution Authority (CRA) requirements. CRA funds can only be obtained for DERA-OMA requirements. DERA-MCA requirements cannot be funded until actual DERA funds are received. The CRA funding is issued for use prior to the FY budget approval by Congress.

After the initial obligation plan submittal, MACOMs must submit updated obligation plans at each work plan review session (quarterly). These plans should be broken down by month with insurance of the executability of the projects.

#### PROGRAM PROCEDURES

In order to expedite the cleanup process, parallel cleanup and study of sites is recommended and encouraged.

Federal Agency Hazardous Waste Compliance Docket. Section 120(c) of CERCLA, as amended by SARA, requires the EPA to establish a Federal Agency Hazardous Waste Compliance Docket. The docket contains information regarding Federal facilities (including Army installations) that manage hazardous waste or from which hazardous substances may be or have been released. The docket is updated every six months and installations are frequently listed as a result of self reporting. Self reporting occurs in several different ways such as; (1) application for a permit for treatment, storage, or disposal facility for hazardous wastes under Section 3005 of RCRA, (2) notification of generation, transportation, treatment, storage, or disposal of RCRA wastes under Sections 3010 and 3016 of RCRA, and (3) identification of sites where hazardous substances have been stored, treated or disposed of and the existence of known or suspected releases of hazardous substances under CERCLA Sections 103(a) and 103(c).

EPA policy specifies that, for each Federal facility that is included on the docket, the responsible Federal agency must complete a preliminary assessment (PA) and, if warranted, a site inspection (SI) within 18 months of publication of the notice.

## Preliminary Assessment/Site Inspection (PA/SI)

The Preliminary Assessment (PA) is a description of sites on real Army property with the potential for having released a hazardous material. The purposes of the PA are to 1) describe the sources and nature of a release, 2) assess the type, magnitude, and likelihood of threats to public health and welfare or the environment, 3) determine the need for removal, site investigation, remedial investigation/feasibility study (RI/FS), or no action and 4) gather existing data to facilitate Hazard Ranking System II (HRS2) scoring by the EPA. Available information used to prepare the PA include personnel interviews, review of records of past waste generation and site management practices, aerial photographs, perimeter inspection of potential sites, on-site inspections, and previous sampling results.

If it cannot be determined that cleanup is necessary from the PA data, a Site Inspection (SI) may be initiated. Unless directed to conduct a SI by the EPA, the SI is an optional phase. Sampling is often performed during the SI to better characterize the source and nature of the release(s). The new, more detailed information will then be used to decide whether to initiate a removal, begin a RI/FS, or terminate response activities.

If the PA indicates that sufficient data exists to facilitate an HRS2 score or indicates that there is an apparent need for a remedial response, the SI phase is not necessary. Besides an SI, remedial responses after the PA may include conducting a RI/FS or a removal action.

At all installations on the Federal Agency Hazardous Waste Compliance Docket, the IC is responsible for submission of a copy of the final approved PA/SI report to the appropriate EPA Region and State authorities within 18 months of being listed. The IC is also responsible for reporting all sites identified in the PA in the DSERTS. When an installation is listed on the Docket all properties within the installation boundary need to be identified in the PA/SI (i.e. National Guard and Army Reserve facilities).

## Remedial Investigation/Feasibility Study (RI/FS)

The RI and FS should be conducted concurrently. The data collected in the RI influences the development of remedial alternatives in the FS, which in turn affects the data needs, scope of treatability studies, and additional field investigations in the RI.

An RI/FS must be started no later than 6 months after an installation has been added to the NPL. Based on the recommendations in the PA/SI, the RI may involve thorough studies of the acreage and the structures on it to characterize the nature and areal extent of potential contamination.

A health risk assessment (HRA) and ecological assessment will be prepared as part of the RI. The HRA and ecological assessment will provide: 1) an evaluation of the potential threat to human health and the environment, 2) the basis for determining if a remedial action is necessary, and 3) the justification for performing the remedial action.

Per AR 200-1, all risk assessments completed at NPL installations must be approved by the Army Surgeon General. This approval is staffed to the Surgeon General through the U.S. Army Center for Health Promotion and Preventative Medicine (CHPPM) (formerly the Army Environmental Hygiene Agency (AEHA)). To facilitate approval of the risk assessment, RI work plans prior to the initiation of field work should be provided to CHPPM for review.

In the FS, data collected during the RI is analyzed and remedial alternatives are identified, including the no-action alternative. The FS identifies alternatives that protect human health and the environment and encompass a range of appropriate waste management options. Alternatives are typically developed concurrently with the RI site characterization, with the results of one influencing the other in an interactive fashion.

Alternatives are evaluated on a general basis with respect to their effectiveness, feasibility of implementation, and cost to identify a range of appropriate waste management options. A detailed analysis of the alternatives will be presented to allow decisionmakers sufficient information to compare alternatives with respect to the nine evaluation criteria (established in Section 300.430(e)(9)(iii) and 300.430(f) of the NCP) and to select an appropriate remedy.

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## Proposed Plan (PP)

The preferred alternative or cleanup approach that will be taken for a site is presented to the public in a Proposed Plan (PP). The PP provides a brief summary of all alternatives studied in the detailed analysis phase of the FS, highlighting the key factors that led to the identification of the preferred alternative. CERCLA 117(a) requires the lead agency to publish a notice and brief analysis of the PP and provide to the public with a reasonable opportunity for written and oral comment. The language and format of all PPs should be presented for the average citizen to read and understand. Copies of the PP must be included at information repositories and/or distributed to mailing lists before the public comment period begins.

In addition, the PP requires that an opportunity for a public meeting/availability session at or near the facility be provided, and that a transcript of the meeting be made available to the public. Where desired, copies of draft PPs can be distributed to RAB members for review to encourage useful input from the public. All draft PPs are to be reviewed by the individual installation Public Affairs Officers. To facilitate approval of the PP, all plans should also be provided to AEC and CHPPM for review.

## Responsiveness Summary

Following the public comment period, the Responsiveness Summary is prepared describing all comments and how the comments have been addressed. The responsiveness summary, to include a transcript from the public meeting, will be incorporated into the final Record of Decision. A copy of the responsive summary is to be placed in the information repositories and notice given to the public that the summary is available for inspection.

## Record of Decision (ROD)

Following receipt of public comments and any final comments from the regulators, a remedy is selected and documented in a ROD. The purpose of the ROD is to document the remedy selected by the Army and EPA, provide a rationale for the selected remedy, and establish performance standards or goals for the site or the operable unit under consideration. The ROD provides a plan for site design and remediation, and documents the extent of human health or environmental risks posed by the site or operable unit. It also serves as legal certification that the remedy was selected in accordance with the requirements of CERCLA and the NCP. The ROD is one of the most important documents in the remedy selection process because it documents all activities prior to the selection of the remedy and provides a conceptual plan for all activities subsequent to the ROD.

The final ROD, including the final Responsiveness Summary, will be forwarded through command channels for approval. The final ROD will not be submitted prior to approval of the final FS report. The final ROD will be signed by the IC and, for sites where an Interagency Agreement/Federal Facilities Agreement (IAG/FFA) exist, forwarded through channels, to include AEC, to the ACSIM for the signature of the DASA(ESOH). The cover memo from the installation/MACOM will provide a name and address to whom the copy signed by the DASA(ESOH) should be mailed. All signed RODs should be reported in the DSERTS.

Per the NCP (Section 300,430 (f)(6)), after the ROD is signed, the Army shall:

- 1) Publish a notice of the availability of the ROD in a major local newspaper of general circulation (the EPA will publish the notice in the Federal Register), and
- 2) Make the ROD available for public inspection and copying at the information repositories at or near the facility prior to the commencement of any remedial action.

Per SARA 120 (e)(2), the remedial action must commence within 15 months of signing the ROD.

#### Decision Document (DD)

The Army has adopted the term "decision document" for the documentation of 1) removal (REM) or interim remedial action (IRA) and remedial action (RA) decisions at non-NPL installations and 2) sites at NPL installations at which REM/IRA decisions have been made. DDs may also be developed by installations for a determination of "no further action" (NFA) for a site(s).

The DD should consist of six parts:

- 1. Purpose of Response Action (REM/IRA/RA/NFA)
- 2. Summary of Site Risk
- 3. Summary of Remedial Alternatives
- 4. Public/Community Involvement
- 5. Declaration
- 6. Signature Page

The purpose of the DD is to 1) demonstrate that the response action chosen is consistent with and meets the requirements of CERCLA and the NCP, 2) insure the evaluations and documentation supporting the response action satisfy the intent of NEPA, and 3) document Army decisions regarding response action selection. The DD for projects which are not covered by an IAG/FFA need not be an elaborate document and in most cases will only be two to three pages in length for simple projects. The DD should represent the Declaration Section of a ROD. All DDs will be maintained in the installation Administrative Record and the installation's permanent environmental files. The installation Public Affairs Office should review all DDs and a copy of all signed DDs should be reported in DSERTS.

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Signature Authority at NPL Installations. The DASA(ESOH) will approve and sign in conjunction with the IC, all DDs where the other signatories of the IAG/FFA are signing (i.e., EPA Regional Administrator and state official) and/or where off-post removals or interim remedial actions are scheduled.

- o If the REMs/IRAs is over \$6 million, the DASA(ESOH) will approve and sign the DD only when the other signatories of an IAG/FFA are signing.
- o If the REM/IRA is over \$6 million and the DD is to be signed by other than the IAG/FFA signatories, the DEP in conjunction with the IC, will approve and sign.
- o If the REM/IRA is in the range of \$2 to \$6 million and the DD is to be signed by other than the IAG/FFA signatories, the MACOM will sign and approve in conjunction with the IC.
- o If the REM/IRA is for less than \$2 million or a decision has been made for NFA and the DD is to be signed by other than the IAG/FFA signatories, the IC will sign and approve.

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## Signature Authority at Non-NPL Installations.

- o The DASA(ESOH) will approve and sign in conjunction with the IC, all DDs for REMs/IRAs/RAs concerning an off-post response.
- o The DEP will approve and sign in conjunction with the IC, all DDs for REMs/IRAs/RAs over \$6 million.
- o The MACOM will approve and sign in conjunction with the IC all DDs in the range of \$2 to 6 million.
- o The IC will approve and sign all DDs for actions less than \$2 million and for a DD for NFA.

All DDs to be approved and signed by either the DASA(ESOH) or the DEP must be submitted through the chain of command to AEC and ODEP for review and comment.

For an outline format and DD example, see Attachment G of this management plan.

Interim policy on decision documents is contained in the 28 Nov 94 memorandum from the ACSIM, subject: Interim Policy for Staffing Decision Documents (DDs).

### Remedial Design (RD)/Remedial Action (RA)

Per SARA 120(e)(2), within 15 months after finalization of the FS report and ROD/DD, the selected alternative must be designed and substantial continuous on-site activity must be underway. A tentative schedule for all critical RD/RA events with estimated funding requirements will be submitted with the FS Report (Preferred Alternative). According to EPA guidance in "Community Relations in Superfund: A Handbook" (January 1992), the Community Relations Plan must also be updated prior to initiation of the remedial design. Once the final engineering design is completed, a fact sheet for the public to read and understand explaining the design must be prepared and distributed.

The contracting process for an RD can be initiated prior to placement of the PP in the repository for public review. However, actual contract award for the RD should not take place until approval of the PP. The design will not proceed beyond the 35% completion stage until the ROD is signed. At the 35% completion stage, the installation will submit, through the MACOM to AEC, a brief status report on the RD effort. The report will highlight significant problems encountered which may cause deviations from the ROD/DD or may require schedule or funding requirement changes. Ramifications of these deviations, with respect to regulatory agency acceptance or anticipated reaction

will be addressed. The requirement for a 35% Completion Report does not eliminate the obligation of the installation to identify, through the chain of command, major problem areas as they occur in the entire process.

If an installation wishes to proceed beyond the 35% completion stage of the RD without an approved ROD, a request to proceed with justification for continued RD action must be submitted to AEC for approval.

The final RD will be forwarded through the MACOM to AEC for inclusion in RMIS and for filing in the TIC.

The DASA(ESOH) must concur with the cessation of RA operations on NPL sites. Prior to the formal conclusion of RA operations, the installation will prepare a draft Completion Report with certification and documentation to establish that the appropriate RA project was conducted in accordance with the ROD/DD, that the project no longer constitutes a threat to public health, welfare, or the environment, and that further RAs are not necessary. draft RA Completion Report will be forwarded through the MACOM for DASA(ESOH) approval. Following DASA(ESOH) conceptual approval and coordination with regulatory agencies, the RA Completion Report will be signed by the IC and forwarded through AEC to the ACSIM for DASA(ESOH) signature. If the FFA requires signature of the appropriate regulatory official, the cover memorandum from the installation/MACOM will provide a name and address to whom the copy should be mailed. The ACSIM will provide AEC a copy of the final RA Completion Report for inclusion in the RMIS and filing in the TIC.

## Removal Action (REM)/Interim Remedial Action (IRA)

Before the initiation and/or completion of the RI/FS and the selection of a permanent remedy, a REM/IRA will be initiated if an imminent threat to health or the environment is revealed. Per the NCP (Section 300.415(b)(2)), the threat may be due to:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, pollutants, or contaminants;
- Actual or potential contamination of drinking water supplies or sensitive ecosystems;
- 3) Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release;
- 4) High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate;

- 5) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;
- 6) Threat of fire or explosion;
- 7) The unavailability of other appropriate federal or state response mechanisms to respond to the release; and
- 8) Other situations or factors that may pose threats to public health or welfare or the environment.

The engineering evaluation/cost analysis (EE/CA) is an analysis of removal alternatives for a site. An EE/CA or equivalent must be prepared whenever a planning period of at least six months exists before the on-site activities are to be initiated (Section 300.415(b)(4) of the NCP).

If the cost of the removal action is greater than \$2 million or will take longer than 12 months to implement, the action will be considered an IRA. Per AR 200-1, before an IRA can be initiated, an individual RI/FS with ROD/DD and an IAG/FFA should be completed, unless the regulatory agencies agree to allow other decision documentation to be completed.

All REMs/IRAs funded with DERA will have a DD prepared and approved prior to commencement of the on-site remedial operations. Time critical, i.e., emergency removals, can have the DD completed after the removal action is taken.

## Off-Site Response Action

To fulfill its CERCLA responsibilities per EO 12580, the Army has the authority to conduct response actions outside of the installation boundaries, where the installation is reasonably considered the sole or the major source of the release. Off-site actions are complex and require extensive coordination. Because of the lack of Army control over the off-site property and the necessity for increased interaction with the public, DASA(ESOH) approval is required.

If there is actual or high potential for off-installation contamination or if there is an actual or high potential health threat to personnel on or off the installation, the DASA(ESOH) will be immediately notified in writing by the IC through the chain of command. If severe, notification of the problem will be made telephonically through each level in the chain of command. The telephonic notification will be followed with a brief report (with map) which will include, as a minimum, a brief site background, the location and extent of the contamination, contaminant(s), information on the suspected source, number of personnel affected, plans for immediate removals (to include request for provision of bottled water), the anticipated long term course of action (if known) and the anticipated near term increased funding requirements.

Requirements for notification procedures and the response plan can be obtained from AR 200-1, Section 9.

## Interagency Agreement (IAG)/Federal Facility Agreement (FFA)

Upon nomination to the NPL, USEPA Regions will request that the installation and state enter into an IAG/FFA. The IC and the DASA(ESOH) will both sign the IAG/FFA for the Army. DoD and Headquarters, USEPA have developed model language that forms the basis for negotiations. Deviations to the model language must be approved at DoD. Normally, installation Legal Offices have the lead in IAG/FFA negotiations; however, the legal chain of command may designate another lead for the installation should the installation/MACOM request assistance.

Per SARA, Sec. 120, within 180 days after EPA's review of the final RI/FS for NPL sites, the EPA and the installation must enter into an IAG/FFA for the cleanup effort. The IAG/FFA will address the completion of all necessary remedial actions at the installation. All signed IAG/FFA information (parties and dates) should be reported in the DSERTS.

For a copy of the IAG/FFA model language, see Appendix A, "U.S. Army Installation Restoration Program Guidance Manual", U.S. Army Environmental Center, December 1993 (2nd Revision).

#### Administrative Record

Section 113(k)(1) of CERCLA requires that an Administrative Record be established and made available for public inspection and copying at or near the installation for all information considered or relied on when selecting the response action. An Administrative Record is a compilation of documents that records the Army's decision-making process regarding the selection of a response action to include: all final IRP reports; correspondence with regulatory agencies; and public participation notices, transcripts, comments, and plans. An Administrative Record must be established and maintained for each NPL installation or non-NPL installation where a response action may be implemented under the authority of CERCLA. The purposes of the Administrative Record are to: serve as a basis for judicial review, document the Army's consideration of all significant public comments, and adequately represent the views of all parties involved.

## Public Participation and Community Relations

Local communities are interested in the results of environmental studies conducted under the IRP because of the potential impact on their health, environment, and economic well-being. The Army fully supports the public involvement programs that require the Army to solicit and consider the comments of the interested individuals, groups, and government bodies before selecting a remedial alternative. Commanders are encouraged to foster open, two-way communication with the local communities as early in the process as possible. This communication should continue throughout the environmental restoration process. Different levels of community relations activities are suggested and required for different phases of remedial response under the IRP.

Community Relation Plan. A community relations or public involvement and response plan is required for all IRP properties that have sites included on or proposed for inclusion on the NPL. The community relations plan is based on interviews with interested people in the community and provides the guidelines for future community relations activities at the site.

Technical Review Committee (TRC). Per 10 USC 2705(C), a TRC will be established whenever possible and practical to review and comment on the Army's actions with respect to releases or threatened releases of hazardous substances at installations. TRC meetings serve as working sessions for exchanging information and organizational viewpoints on operational progress, recommended applicable or relevant and appropriate requirements (ARARS), problems, and scheduling. Members of a TRC will include at least one representative from the Army, USEPA, and appropriate state and local authorities, and will include a public representative(s) of the community(s) involved.

The IC is responsible for establishing and chairing or designating an installation/Army chairperson for the TRC as part of any ongoing IRP cleanup program at and related to the installation, if the installation is included or proposed for inclusion on the NPL, or if a high level of community interest has been expressed about the cleanup.

Restoration Advisory Board (RAB). To further facilitate public involvement, the DoD and the Army are recommending the establishment of RABs. The RABs are intended to be a forum for exchange of cleanup program information between the decision makers and the affected community as well as providing the opportunity for more meaningful community participation in the decision making process.

RAB formation is required when community interest in the cleanup program is sufficient and sustained. The installation Commander is responsible for identifying sufficient and sustained community interest through an outreach program. Community involvement techniques such as surveys, interviews, advertisements and public

information meetings should be used to educate the community and solicit their feedback. If the installation solicits for interest and finds that there is not enough to support establishing a RAB, they should document their efforts and attach that documentation to the Community Relations Plan. Follow up procedures to monitor community interest on an ongoing basis should also be established. If, however, sufficient interest is determined, the installation shall proceed in accordance with the Army's "Guidance for Developing Restoration Advisory Boards", dated 11 Apr 94. Additional indicators of sufficient and sustained interest in the cleanup program include a request from a local government or a petition from fifty local residents to form a RAB.

The RABs are to be composed of Army, USEPA and state environmental regulatory representatives, local Government representatives, and members of the local community. If a RAB is to be established at an installation that has a TRC, the TRC will be expanded or modified to become a RAB. A RAB is considered to comply with 10 USC 2705(c).

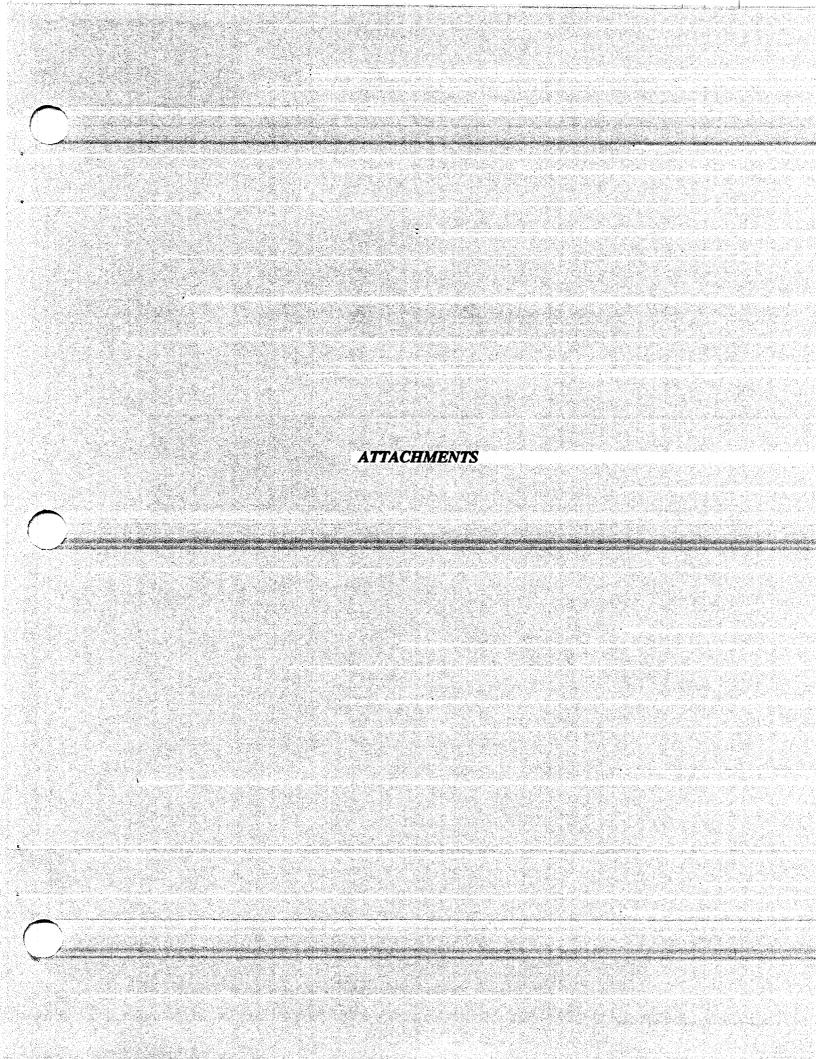
Installation costs associated with either administrative or technical support to the RABs are eligible for DERA funding. To obtain necessary funding, the installations must identify their needs to their appropriate MACOM using the RCS-1383 process. Installations shall submit a separate RCS-1383 request for these funds and title it "RAB Support".

With the signing of the Fiscal Year 1995 National Defense Authorization Act, the DOD was authorized up to \$7,500,000 of DERA and BRAC funds to support citizen participation on the RABs. The Army's share will be \$2,200,000. This authorized support is to include providing funds to the RAB community members to obtain their own technical assistance. Regulations on how to implement this funding program are being prepared and will be distributed before any funds for this purpose are expended.

See Attachment H for an example RAB Support RCS-1383 Report.

For additional RAB guidance see Guidance for Developing Restoration Advisory Boards, 11 Apr 94, the Restoration Advisory Board Workshop Guidebook, Summer 1994, and the Restoration Advisory Board Implementation Guidelines, Sep 94.

For more specific guidance on the Army IRP, please see "U.S. Army Installation Restoration Program Guidance Manual", U.S. Army Environmental Center, December 1993 (2nd Revision). For a list of available IRP guidance, see Attachment I of this management plan.



# ATTACHMENT A

DERA ELIGIBILITY

#### ATTACHMENT A

## ACTIVITIES ELIGIBLE FOR DERP FUNDING

Investigations to identify, confirm and determine the risk to human health and the environment, feasibility studies or engineering evaluation and cost analysis (EE/CA); remedial action plans and designs; and removal or remedial actions.

Technology Demonstration and Validation necessary to conduct cleanups (6.4 research category in accordance with PBD 299, December 3, 1993)) for FY95 and FY96.

Expenses associated with cooperative multi-party cleanup plans and activities, including litigation expenses.

Remedial actions to protect or restore (not enhance) natural resources damaged by contamination from past hazardous waste disposal activities.

Cleanup of low level radioactive waste sites which have been identified as IRP sites.

Management expenses associated with the IRP. Management expenses are those overhead costs required for adequate program oversight and management.

Operation and maintenance costs for remedial and monitoring systems.

Immediate actions necessary to address health and safety concerns such as providing alternate water supplies or treatment of contaminated drinking water, when the hazard results from a release from DoD property or FUDS.

Studies to locate abandoned underground tanks, activities to determine whether a release has occurred, and clean up of contamination.

Response to releases from in service tanks discovered during initial integrity testing (leak detection monitoring) per 40 CFR 280 where testing was conducted prior to the regulatory date of December 22, 1993.

CERCLA response actions and eligible RCRA corrective actions (see items below) identified in FFA/IAGs.

Corrective actions at solid waste management units (SWMUs) required by 3004(u), (v) and 3008(h) of RCRA.

## ACTIVITIES ELIGIBLE FOR DERP FUNDING (Continued)

Support services provided by another agency in accordance with 10 USC 2701 (d).

Fines and penalties imposed by regulatory agencies assessed under the authority of the Federal Facilities Compliance Act associated with IRP activities.

Remediation actions for OEW located at FUDS.

Remediation of inactive Open Burning/Open Detonation/Static Firing Sites which do not have an interim or final RCRA permit or areas which are deleted from a permit or deleted from a permit application and on which no actual treatment operations have been conducted since the Part A interim status permit was issued.

## ACTIVITIES NOT ELIGIBLE FOR DERP FUNDING

Closing or capping sanitary landfills unrelated to a hazardous waste cleanup action.

Construction of hazardous waste storage, transfer, treatment or disposal facilities, except when part of a IRP response action.

Testing or repair of active underground tanks and costs of replacing leaking underground tanks.

Costs of testing, storing, disposing or replacing PCB transformers.

Costs of asbestos and lead based paint surveys, containment, removal or disposal, except where incidental to a DERP response action.

Costs of spill prevention and containment measures for currently operating equipment and facilities.

Cleanup costs of spills associated with current operations.

Costs of operation, maintenance or repair to hazardous waste treatment, storage, or disposal facilities which are currently in use (i.e., regulated or permitted), except when part of a DERP response actions.

Costs of hazardous waste disposal operations, including associated management and operational costs, unless the costs result from implementation of a DERP response action.

Overseas Environmental Restoration activities.

# ACTIVITIES NOT ELIGIBLE FOR DERP FUNDING (continued)

State support services prior to October 17, 1986, past state costs not reasonably documented, state services in support of non-Environmental Restoration Program funded cleanup activities of FUDS, unless approved by DUSD(ES).

Actions (contingency response and closure) at regulated Treatment, Storage or Disposal (TSD) units which meet standards under 40 CFR 264, and which have been issued a final operating permit under 40 CFR 270.

Facility improvements to meet RCRA operating standards at TSD units.

Unexploded ordnance clearance from active or former ranges unless it presents an imminent threat to safety and is approved by the DUSD(ES).

Expenses associated with the defense and settlement of claims against the US under the Federal Tort Claims Act.

Environmental technology for 6.1, 6.2 and 6.3 funding categories.

Remediation and/or closure of Open Burning/Open Detonation/Static Firing sites which are included in a RCRA hazardous waste treatment permit or permit application or portions of prior permitted sites on which actual treatment operations have been conducted since the Part A interim status permit was issued.

Remediation of active impact ranges and firing tables.

# ATTACHMENT B

# REVISED APPENDIX K

POLICY AND GUIDANCE FOR IDENTIFYING

US ARMY ENVIRONMENTAL PROGRAM REQUIREMENTS

VOLUME II

JULY 1993

#### APPENDIX K -- RESTORATION PILLAR GUIDANCE

#### PURPOSE.

a. This appendix provides detailed guidance to assist installation environmental personnel in preparing Defense Environmental Restoration Program (DERP) project requirements identified through the Environmental Pollution Prevention, Control and Abatement Report, RCS DD-P&L(SA) 1383 (RCS-1383 Report). The RCS-1383 Report system was originally developed around the Environmental Compliance Achievement Program (ECAP), not the DERP. This appendix will address minor additions and changes applicable to RCS-1383 Report submissions for DERP projects.

#### 2. SCOPE.

- a. The Army's environmental restoration programs includes the Installation Restoration Program (IRP), the Base Realignment and Closure Environmental Restoration (BRAC ER) Program, the Formerly Used Defense Sites (FUDS) Program, and the Defense and State Memorandum Of Agreement/Co-operative Agreement (DSMOA/CA) Program. With the exception of BRAC ER, all the above programs are a part of the DERP.
- b. The BRAC ER program is not a part of the DERP and has a separate funding appropriation. However since the BRAC ER program's purpose is restoration of the environment, BRAC ER projects are included under the Restoration pillar. The RCS-1383 Report process is very similar between the IRP and the BRAC ER program. IRP and BRAC ER identify, assess, and clean-up sites contaminated by previous activities at active and semi-active Army and Army Reserve installations. IRP and BRAC ER allocate resources to promote effective and expeditious clean-up. The Army works closely with EPA and the States in defining appropriate clean-up measures and schedules for remediation. For detailed information on the BRAC ER Program, see Appendix N of this policy document.
- c. The Army is responsible for implementing the DERP for lands formerly owned or used by any DOD component (FUDS). Investigation and clean-up procedures at FUDS are similar to those at currently owned active DOD facilities.
- d. The Army is also responsible for implementing the DSMOA program for the Department of Defense (DOD). Requirements under the DSMOA Program include agreements for DERP funding for states under CERCLA/SARA.

e. In previous years, Other Hazardous Wastes (OHW) Operations and Building Demolition/Debris Removal (BD/DR) were included in the DERP. OHW projects are part of the Prevention pillar and are the components responsibility and should be programmed within the component's resources and not DERP. BD/DR is limited to the FUDS restoration program. BD/DR activities at a DOD owned installation are the component's responsibility and should be programmed within the component's resources and not DERP. Restoration activities at OCONUS installations are not funded by DERP but by VENC under ECPPCP "Other Compliance".

#### 3. REFERENCE.

- a. Memorandum, DUSD(ES), 14 Apr 94, Subject: Management Guidance for Execution of FY94/95 and Development of the FY96 Defense Environmental Restoration Program.
- b. Army Regulation AR 200-1, Environmental Protection and Enhancement, Apr 90.
- c. Memorandum, DAIM-ED-R, 10 Sep 93, Subject: Installation Restoration Program (IRP) Management Plan.
- d. <u>U.S. Army Installation Restoration Program Guidance</u>
  Manual, December 1993.

#### 4. GENERAL.

- a. The Superfund Amendments and Reauthorization Act of 1986 (SARA) established the DERP and specified that the DERP shall be carried out in a manner consistent with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA). CERCLA requires response at inactive hazardous waste sites which have released or have a potential to release hazardous substances, pollutants or contaminants which may present an imminent and substantial danger to public health and welfare.
- (1) CERCLA and SARA, as with other environmental laws, were enacted to protect public health and the environment. However, there is a substantial difference in the way CERCLA and SARA are administered from other laws. CERCLA and SARA specify statutory and regulatory deadlines for identifying and assessing potential hazardous waste sites. The regulatory community sets a priority for identifying and assessing these sites based on results from hazard ranking models. The results obtained from the model indicate potential health and environmental risk. If the potential health and environmental risk for a site is high, the site is placed on the EPA's National Priorities List. Once

placed on the list, an agreement for cleanup of the site is negotiated between the responsible party and the appropriate regulatory authority. Violations to CERCLA and SARA occur when terms of the agreement are not met.

- (2) Under other environmental laws, such as the Resource Conservation and Recovery Act (RCRA), health and environmental risk is embedded behind the law. Violations occur when legal requirements (such as schedules or discharge limits) of promulgating regulations are not followed. Individual violations may not appear to be serious public health or environmental threats, but are nevertheless violations of the law or regulation.
- (3) Differences between what is considered a "violation" of environmental laws and in turn what projects are "Class I" have created some misunderstandings for IRP personnel when preparing RCS-1383 Report submissions.
- b. DERP projects are funded by a special transfer account, the Defense Environmental Restoration Account (DERA). DERA eligible requirements, regardless of which environmental act dictates remediation (e.g., CERCLA, RCRA, etc...) will be programmed for DERA funding through RCS-1383 Report submittals by using Fund Codes 15 through 18. The annual IRP Work Plan is a prioritized listing of all identified DERA eligible requirements for active sites Army installations.
- c. Installation and major Army command (MACOM) environmental offices are required to ensure that all RCS-1383 Report financial data for all Class I and Class II projects are reviewed by installation/MACOM resource management and legal staffs (ensures awareness of impending legal requirements).
- d. If an installation receives a RCRA operating permit, a RCRA Facility Investigation (RFI), Corrective Measures Study (CMS), Interim Corrective Measures (ICM) or Corrective Action (CA) may be required under the corrective action portion of the permit. The RCRA operating permit of an initial RCRA Facility Assessment conducted by the EPA identifies all Solid Waste Management Units (SWMUs) at an installation. Not all SWMUs identified for response under the corrective action portion of a RCRA operating permit are eligible for DERA funds.
- (1) Investigations and corrective action at SWMUs resulting from past operations can be funded with DERA.
- (2) Investigations and corrective action at SWMUs resulting from on-going operations <u>cannot be</u> funded with DERA.
- (3) In those cases where it is impossible to determine if the source of contamination is from past or current operations, DERA funding can be used to determine the actual source.
- (4) If a statement of work (SOW) for a restoration project includes DERA-eligible and ineligible sites, then the SOW must be broken into two separate tasks that are distinct and are funded separately.

e. Formerly Used Defense Sites (FUDS) are properties that were formerly owned or used by one of the Military Services. The FUDS program is responsible for cleaning up DOD caused contamination at these sites. The FUDS Program is executed by the U.S. Army Corps of Engineers (USACE), Military Programs Directorate. Only USACE personnel prepare RCS-1383 Report project submittals for FUDS. Installations should neither submit FUDS Program RCS-1383 Reports nor use the term FUDS in RCS-1383 Report projects.

#### 5. IRP WORK PLAN.

- a. The RCS-1383 Report is the basis for the Army's Active Sites IRP Work Plan. The Army Environmental Center (AEC) consolidates all RCS-1383 Reports submitted by the MACOM and prepares a work plan based on RCS-1383 Reports with valid DERA Fund Codes. Installations are responsible for submitting all RCS-1383 Reports with DERA-eligible requirements (except Program Management) through their MACOM to AEC. In the case of an apparent discrepancy, AEC seeks resolution from the MACOM regarding questionable DERA-eligible projects, funding levels or priorities. To ensure inclusion to the IRP Work Plan, all corrections must be returned to AEC through the MACOM within two weeks of notification or at the IRP Work Plan review meeting. AEC also ensures that all RCS-1383 Reports with valid BRAC ER Fund Codes are incorporated into the BRAC ER Work Plan.
- b. If it is determined that a project with a valid DERA Fund Code is not eligible for DERA, the MACOM will be notified to correct the Fund Code for funding under VENC. When new BRAC ER installations are identified by DOD, AEC will take the lead to coordinate the change-over from the Active Sites IRP Work Plan to the BRAC ER Work Plan, and will notify the appropriate MACOM and installation.
- The Army prioritizes all RCS-1383 Report requirements under the IRP based on addressing the worst contaminated sites first. To prioritize DERA RCS-1383 Report requirements the Army developed Priority Sort (PS) Codes (See Annex 1). Based on the RCS-1383 Report, line items with a PS code are placed in the IRP Work Plan. When the IRP Work Plan is sorted by PS code, each line item is prioritized. When the Army receives the DERA budget, a cutline is established for funding projects in the IRP The AEC will notify MACOMs where the cutline falls by Work Plan. PS code. When there are projects above and below the cutline with the same PS code, within their command, the MACOM can initiate an internal prioritization of projects with the same PS The MACOM must notify AEC as soon as possible on any internal priorities so that changes can be integrated into the IRP Work Plan.

#### 6. CLASSIFICATION OF REQUIREMENTS.

- a. For the purposes of DERA, Class I projects are defined as projects which require funding for environmental cleanup to meet all statutory and applicable regulatory deadlines, compliance orders, and agreements.
- b. Any project considered to be a Class I requirement must include a full justification in the narrative section. The justification should include the actual schedule dates from the Federal Facility Agreement (FFA)/Interagency Agreement (IAG), or Compliance Agreement/Order. Class I should be used only when a known action, (i.e., approval of a Record of Decision/Decision Document (ROD/DD)) is a certainty in the budget year based on an FFA/IAG schedule. In cases where there is a possibility that the ROD/DD will be approved earlier than scheduled in the IAG/FFA, the RD/RA project based on approval of the ROD/DD does not constitute a Class I requirement until the ROD/DD is actually signed. By documenting specific circumstances in the narrative section of the RCS-1383 Report, the IRP Work Plan development procedures are flexible and can facilitate anticipated changes.
- c. For RCS-1383 Reports with DERA Fund Codes, the following types of projects should be considered Class I:
- (1) Projects required to meet regulatory time requirements of CERCLA and SARA. Installations should include the effective date of the action which initiated the time requirement. Specifically:
  - (a) Initiation of a preliminary assessment within 18 months of the installation being placed on the Federal Docket.
  - (b) Initiation of a RI within six months of the site being placed on the National Priorities List (NPL).
  - (c) Initiation of the RA within 15 months of the signing of the ROD for NPL sites. For non-NPL installations, initiation of the RA within 15 months of the signing of the ROD/DD is also Class I. If the RA is not a regulatory driven corrective action or in response to a Compliance/Consent Order, then the project is Class II/Code H.
- (2) Projects that lead directly to meeting the schedule for primary documents as specified in the FFA/IAG for NPL sites as defined when listed in the Federal Register. There must be a definitive schedule in the FFA/IAG to qualify as Class I. Work on an NPL site, not required in the submission of primary documents to meet a specific regulatory requirement, is Class II/Code M, not Class I.
- (3) DERA qualifying projects leading directly to meeting a Compliance Agreement or Consent Order schedule.

- (4) DERA qualifying projects, as cited in a RCRA Notice of Violation (NOV), which are directly required to ensure that installation operating permits are met. Most FFAs are written to include DERA-eligible RCRA SWMUs, thus the FFA protects these sites from being cited in NOVs. As a result, RCRA work conducted under terms of an FFA normally will be Class II/Code H, not Class I unless there is a definitive schedule for performance in the budget year.
- (5) Projects or actions to respond to adjudicated Federal court directed settlements or signed consent orders.
- d. The following types of projects should NOT be considered Class I for the submission of RCS-1383 Report requirements:
- (1) Being identified in the Proposed Rule for Federal Compliance Docket Update in the Federal Register or being listed as Proposed for the NPL does NOT warrant Class I designation, but Class II/Mode M.
- (2) Projects with other non-time driven requirements of CERCLA and SARA are <u>NOT</u> considered Class I projects by themselves without substantial additional justification.
- (3) Projects based on the assumption that the project is necessary, and that the project will be legally required sometime in the future, should be given Compliance Status Code PSDF and be Class II/Code L.
- (4) On installations not covered by an FFA, RCRA permit requirements are Class II/Code H, not Class I, unless the installation is currently in violation of the permit. Funding from other accounts may be required if sufficient DERA funds are not available due to higher priority projects in the IRP Work Plan.
- e. Projects to respond to imminent and substantial health threats concurred with by an appropriate Army Medical Department (AMEDD) authority (most frequently the U.S. Army Center for Health Promotion and Preventive Medicine (USACHPPM) formerly the U.S. Army Environmental Hygiene Agency (AEHA)), will be given a very high priority for DERA funding in the IRP Work Plan. In order to ensure proper placement in the IRP Work Plan at this high priority, projects with known or with a high potential or imminent and substantial health threats should be listed as Class I/Code H. In order to obtain proper prioritization, those threats should be clearly identified and explained in the narrative section, along with the identity of the AMEDD official and agency concurring with the health threat.
- f. Although related, the compliance classes do not directly correspond to the DOD Priority which is defined in reference 3a.

#### PREPARATION OF THE RCS-1383 REPORT.

a. Installation Commanders (ICs) are responsible for all DERA environmental actions and funding requests. ICs may delegate the functional responsibility for executing IRP activities to USACE Districts, AEC or the installation environmental office. The Executing Agency may provide IRP services either through in-house efforts or by contract. The Executing Agency functions as a technical consultant to the IC. With respect to this role, the Executing Agency provides assistance and input to the installation in identifying requirements and estimating associated costs for DERP projects.

- The initial step in preparing DERA RCS-1383 Report submissions is the development of an Installation Action Plan The IAP lays out all IRP requirements and addresses a comprehensive life cycle program to conduct investigations and remedial actions necessary to eliminate contamination at all nonoperational hazardous waste sites. The sites or operable units will be defined by Defense Sites Environmental Restoration Tracking System (DSERTS) number in the IAP. The IAP preparation is the responsibility of the installation, although the installation may request the Executing Agency prepare the IAP in close coordination with the installation environmental staff. The IAP should reflect realistic goals and schedules based on known and expected IRP problems. A tentative budget is included to carry projects through the entire life cycle remedial process. Cost estimates can be developed based on conservative, realistic or worst case assumptions. Worst case assumptions should be used for estimating project costs initially. The Remedial Action Cost Engineering and Requirements system (RACER) is recommended as a tool for preparing cost estimates. As additional information is obtained, the IAP and project RCS-1383 Report submittals should be revised accordingly. Installations should assume during the development of the IAP that sufficient DERA funding will be made available to accomplish the work. The IAP is to be updated annually and submitted to AEC through the MACOMs by 1 Feb of the each fiscal year (FY).
- c. Critical projects that are schedule driven by an IAG, FFA or a Compliance Order should be highlighted in the RCS-1383 Report narrative section and include appropriate dates. The dates will be the scheduled initiation or completion dates in the FFA, IAG or Compliance Order. DERA funds should be requested in the year needed. Current year DERA funds should not be requested for contingency projects. DERA funds should be requested only for those projects which can be executed within that year.

  Projects which can be initiated before a mandatory scheduled date beyond the budget year will be classified as Class II/Code M. The narrative section should clearly state that the project can be expedited in an earlier FY if DERA funds were available and must include the date the project will become Class I. Do not

reflect the project funding requirement (by making an entry) in an earlier FY and again in the mandatory scheduled FY. Reflecting the same requirement in two different FYs will cause a double counting of DERA requirements.

- d. Operable units can be used to facilitate the planning of an installation-wide response program (See Annex 2). In some cases, an operable unit may include several projects/sites under one contract and in other cases one project/site may be a part of several different operable units. The individual projects/sites within the operable unit must have equal priorities in both the DOD risk based system and the Army Priority system.
- (1) Formally established Operable Units at installations with FFAs normally have an operable unit number designated by the U.S. Environmental Protection Agency (EPA) on-scene coordinator. This two digit operable unit number must be reflected on the RCS-1383 Report project submission. Only formally established operable units (via FFA/IAG or defined in an approved IAP) will be used in the RCS-1383 Report submission.
- (2) Just like any other IRP project, estimated costs on the RCS-1383 Report for an operable unit should be provided through the expected duration of remediation, to include long term monitoring and remedial action operations.
- (3) In many cases, long term monitoring may be itself an operable unit.
- e. Project titles for the RCS-1383 Report should be the name of the operable unit or the name of the site(s) to include the DSERTS number(s). The project title should not include the status of the remedial process. For example, use "Abandoned Lewis Street Dump, FTDE-007", not, "Remedial Investigation of Abandoned Lewis Street Dump". By using only the site name and not the phase in the project title, progress at a site can be easily tracked throughout the IRP process and in the funding data bases.
- f. Since DERP projects are normally phased from Preliminary Assessment (PA) to Site Inspection (SI) (or to Site Investigation (SN)) to Remedial Investigation (RI) to Feasibility Study (FS) to Remedial Design (RD) to Remedial Action (RA), the Pollutant Category (e.g., PASI, RINV, etc.) will change over the life cycle of the project. Therefore, the Pollutant Category List for Law/Reg = SFND should relate to the phase of the project for the budget year. The narrative section should be used to define and clarify the project status and its associated yearly funding. Additionally, if more than one project status (e.g., a removal in conjunction with an FS) occurs in the budget year, the most significant or highest cost requirement would be reflected as the pollutant category; however, the narrative section must reflect both actions. Note: For RCRA programs use the SFND Pollutant Category List for the study phase as shown in Annex 3.

- g. The Pillar field entry for most DERA requirements is Restoration (RST). The Foundation (FDN) will NOT be used for DERA funding requests except for projects entered by the MACOMS to cover program management costs. All other DERA program costs should be entered under the Restoration Pillar.
- h. The Fund Codes for DERA are 15 through 18 and equate to continental United States (CONUS) Environmental Law/Regulatory Area = SFND. [Per reference 3b, Overseas IRP activities not subject to U.S. law are not eligible for DERP funding.] Cases where the Fund Codes for DERA do not equate to CONUS SFND should be explained in the narrative section in order project review and inclusion in the IRP Work Plan. Actions taken to comply with the provisions of an FFA or IAG will reflect CONUS SFND, regardless of which environmental law or regulation forces the action. DERA-eligible sites combined in a RCRA driven Federal Facility Compliance Agreement or Corrective Action are coded under RCRA (CORA and USTS) even though DERA funded. The DERA Fund Code and identification as the Restoration Pillar further identifies these projects.
- i. The RCS-1383 Report is used by Resource Managers in the planning, programming, budgeting and execution system. Optimally, narrative sections should be detailed, stand alone justifications, with the use of acronyms, terms and phrases listed in Annex 4. At this time, the EPA data base into which the RCS-1383 Report feeds, only accepts 500 characters in the narrative section. The RCS-1383 Report data base software will be modified to allow for 1000 character narrative section.
  - j. The narrative section should identify the following:(1) DoD Priority Code: DOD priority codes include:
    - (a) 1A -- High relative risk sites with regulatory agreements/order.
    - (b) 1B -- High relative risk sites without regulatory agreements/order.
    - (c) 2A -- Medium relative risk sites with regulatory agreements/order.
    - (d) 2B -- Medium relative risk sites without regulatory agreement/order.
    - (e) 3A -- Low relative risk sites with regulatory agreements/order.
    - (f) 3B -- Low relative risk sites without regulatory agreement/order.
- (2) Army Priority Sort Code: Before preparing the RCS-1383 Report, installation environmental personnel should review the Army Priority Sort Code definitions and propose an appropriate priority sort (PS) Code for the project in the narrative. A field for PS Codes will be added to the RCS-1383 Report data base software.

(3) Supporting data for proposed PS Code: The narrative section should provide enough information to support the proposed PS Code. (Note: The actual priority code will be assigned by AEC after review of the RCS-1383 Report narratives during the development of the IRP Work Plan.)

(4) Executing Agency: The installation shall identify the executing agency in the narrative. Executing Agencies are typically USACE Districts or Divisions, AEC, USACHPPM (PA/SI

only) or installations.

(5) DSERTS Numbers: In the narrative, the installation shall identify the DSERTS number for each site being addressed by the RCS-1383 Report. All sites in the IRP must be listed in the DSERTS database. The sites must also be identified in the IAP. If a site is new, the narrative must state "new site" and assign an appropriate DSERTS number.

(6) Funds Required by Year and by Phase: The project phase (status) and its associated required funding for the current FY and FY+1 should be detailed in the narrative. Note: The total required funding for the project to include remedial action operations and long-term monitoring must be entered in the

RCS-1383 Report under Fund Type.

(a) When a RCS-1383 Report concerns more than one phase for a site, funding for each phase must be separated in the narrative. An example would be to conduct a removal action at the same time as a feasibility study.

(b) Only the RI/FS phases may be identified together, all other phases, such as PA/SI or RD/RA must be

identified separately.

(c) For current year funds, the narrative <u>must provide</u>

the quarter of award.

(d) The project funds must include scoping, current year salaries and administration costs, and the contract award cost as part of the estimate.

- (e) Prior year contract administration costs has a specific PS code and therefore must be broken out in the narrative from other project costs. See Section 8(a)(2) for further discussion.
- k. Example RCS-1383 Reports are provided in Annex 5.

#### 8. OTHER RELATED TOPICS.

a. Executing Agency:

(1) The Executing Agency is responsible for notifying the installation of changes in on-going project funding requirements and changes due to the ability to execute a project. This includes the Executing Agency identifying to the installations the potential for the need for Military Construction, Army (MCA); Other Procurement, Army (OPA); or any other non-Operations and

- (2) USACE as an Executing Agency must coordinate all projected scoping and Contract Administration costs to include Supervision and Administration (S&A) costs, Supervision and Review (S&R) costs and other project expenses with the installation environmental personnel responsible for RCS-1383 Report submissions. This action is applicable to all current and prior year contracts. Only prior year costs will be identified separately in the IRP Work Plan. Current year and out year scoping and Contract Administration costs must be included in the project costs. AEC will notify MACOMs/installations that did not identify these prior year costs in RCS-1383 Report submissions and request corrections.
- b. Annual Line Item Reviews (LIRs) by MACOMs of installation RCS-1383 Report submissions are encouraged. During these reviews, key personnel from the installation, MACOM, Executing Agency and AEC meet to go over line by line the various installation projects in the IRP Work Plan and the associated RCS-1383 Reports. Prior to the LIR, thorough review and coordination between the Executing Agency and the installation during RCS-1383 Report preparation and submittal can ensure the success of the projects.
- C. Reprogramming changes which require a new Fund Code of DERA-MCA must include submittal of a DD Form 1391 in addition to a revised RCS-1383 Report. A formal request for reprogramming should be submitted through the MACOM to the Director of Environmental Programs (DEP), copy furnish AEC. The request must contain the completed revised RCS-1383 Report submittal, the completed DD Form 1391, the current cost estimate, an explanation of DERA-eligibility and a statement, along with the identity of the AMEDD official, of substantial danger to human health or the environment. If MCA funds are required for a signed ROD/DD, the effective date of the signed ROD/DD and the scheduled date that the funds are actually required must be provided.
- d. Installation project management requirements will be identified off-line to the appropriate MACOM Environmental Office. Following approval of the project/program management requirements by the ACSIM, the MACOM will submit a consolidated RCS-1383 Report project reflecting all DERA requirements for the command. When practical, the narrative section will provide a breakdown of funding by installation. MACOMs with a large number of installations should forward the breakdown to the AEC under separate cover.

e. Identifying Underground Storage Tank (UST) requirements under the IRP can be difficult due to the restrictions for using DERA funds. Under the IRP, abandoned UST projects rarely receive a high funding priority. Removal of known abandoned USTs that leaked and surrounding contaminated soil projects are programmed and prioritized independently of the plume definition and site investigation projects. Projects involving plume definition and site investigation are placed in the IRP Work Plan and are prioritized in the same manner as any other IRP site.

(1) The following UST projects may be funded by DERA:

- (a) Studies to locate abandoned USTs not used since Jan 1984.
- (b) Activities to determine whether a release has occurred at an abandoned site.
- (c) Response to a known release at an abandoned UST site to include removal of the tank and surrounding soil (unless the response is incidental to tank replacement and cleanup of contamination).
- (2) DERA will not fund:
  - (a) Testing or repair of active USTs or costs of replacing leaking USTs.

(b) Removal of abandoned tanks which did not leak.

- (3) The narrative section of the RCS-1383 Report submission must make DERA-eligibility of UST projects unquestionable.
- f. MACOMs and installations must continually review both the draft and approved copies of the IRP Work Plan, to determine the probability for DERA funding during the current and following FY. Following revision of the IRP Work Plan, but prior to DEP approval, AEC will provide MACOMs with a listing of all Class I projects that are not currently in the funded zone. AEC will review the RCS-1383 Report narrative for support of Class I designation. If Class I classification is not supported, AEC will provide recommendation for review/ revision to the MACOM. AEC will also provide this information to the ACSIM to be presented to the Army Program Budget Committee as a DERA shortfall. If the Army Program Budget Committee does not fund the shortfall, MACOMs must decide whether to attempt to fund the projects from other appropriations, or to attempt to negotiate extensions with the regulators.

#### 9. ANNEXES.

- 1. Army Priority Sort Code Definitions.
- 2. Definition of Operable Unit.

3. Pollutant Categories.

4. List of Acronyms for IRP RCS-1383 Reports.

5. Example RCS-1383 Reports.

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# DERA ARMY PRIORITY SORT DEFINITIONS<sup>1</sup> February 1995

#### PS CODE PROJECT

A Confirmed Off-Post Contamination/Imminent Threat to Human Health

To be determined by the IC following consultation with the MEDDAC personnel. Provides funding for those cases where off-post contamination or on-post threat to human health, i.e., water supply, is confirmed and immediate relief is needed. This category will be applied to projects that remove or reduce the threat to human health (e.g. alternate water supply or source removal) and to studies of these sites.

B Imminent Threat to Environment

This category will only be used with approval of DASA (ESOH) in situations where critical environments are threatened by continuing releases.

COST OF DOING BUSINESS (In general, not to exceed 15%)

C Management & Salaries

Includes salaries, travel, supplies, MACOM program management, TJAG support, and any other mission-funded costs.

D Supervision & Administration (S&A) (prior year)

Exclusively for S&A on projects funded in previous fiscal years. Current year S&A receives same priority as project. This category is NOT intended for "in house" support.

E Program Support (Overall Army program - not installation specific)

Includes funding for:

- technical support (e.g., total program data management, analytical procedures validation and methods development and technical information repository).
- DA public affairs.
- ADP equipment procurement.
- mission-essential training (OSHA or other mandated training). Not to exceed 0.5% of total program.

<sup>1</sup> NO INSTALLATION MAY RECEIVE MORE THAN 10% OF THE APPROVED DERA WITHOUT APPROVAL OF THE DEP AND DASA (ESOH). JUSTIFICATION FOR ADDITIONAL REQUIREMENTS MUST BE MADE IN WRITING TO THE ARMY ENVIRONMENTAL CENTER.

#### F Project Support

Includes funding for:

- expediting FY + 1 projects; specifically for scope preparation for projects in the FY + 1 work plan. These projects are authorized only for immediate scope preparation and will not be submitted for procurement unless given direction to do so by the CDR AEC. Projects that are authorized by the CDR AEC for submittal to procurement are designated FYXX SAF. These projects will either be late 4th quarter awards or be given the designation of "M" for the following fiscal year, and become 1st quarter awards in that year. Scoping funds are only to be used to pay CE Districts. Scope preparation for projects in the current year work plan come out of current year project requirements.

- CHPPM services in support of AEC and CE efforts.

- EOD/Tech Escort Unit Support for projects funded in the prior year and/or surety screening.

Note: Project support for current year projects are listed at the project's priority level.

#### G Federal Agency Hazardous Waste Compliance Docket - PA/SI

For conducting PA/SIs at non-NPL facilities listed on the docket to obtain initial or follow-up information necessary for EPA to rank the facilities for placement on the NPL.

#### H Fines and Penalties

For fines and penalties that have been approved in the budget. Note: The budget year is FY+2.

#### I Cost Growth (prior year)

For legitimate, i.e., no additions in scope, cost growth from a previous year that may be funded with current year money. Requests must be made for use of existing prior year funds. This category will not be used for follow-on work in either options contracts or indefinite delivery order contracts.

#### K IRA/Removals

Provides for expedited IRA/removals identified in the most recent Installation Action Plan (IAP). No investigations are allowed under this priority. The total of all projects in this category will not normally exceed 5% of the funded Army DERA.

## M SAF (prior year)

Includes those projects, depending on DERA appropriation and scope preparation projects, from the previous fiscal year which were designated SAF and remained unfunded. These projects must be awarded in the 1st quarter otherwise the projects will revert to a priority based on their merit.

#### N Remedial Action Operations (RAOPS)

Funding for long-term RAOPS. This category includes monitoring in support of a DA-approved ROD or other decision document. This also includes 5-year relooks.

#### O Litigation Driven Programs

Programs resulting from judicial orders. Requires DAJA-EL concurrence.

Q PRP Settlements

Payments by the Army on third party sites due to legal actions.

S MOUS, MOAS, FFAS and IAGS

Includes funding for agreements made at the DA level between the Army and any outside organization. ATSDR funding must be authorized and funded by DoD. This category does not include DSMOA's, but includes the payment of regulatory oversight costs where an IAG has been signed at the DA level and no DSMOA is in effect. This category is not to be used for project priorities under CERCLA/SARA 120 agreements.

U NPL Sites with Signed ROD

V NPL Sites w/IAG and Regulator Approved Schedules

Projects under this category must be necessary to satisfy IAG requirements. This category should not be used for discretionary projects within the IAG framework. This category can also be used for projects at NPL sites with a Proposed Plan and ROD under preparation but not yet signed. ROD signature must be scheduled for the current year to receive this priority.

X High Potential for Off-Post Contamination

This category should be used when contamination has been confirmed at or in close proximity to the installation boundary, and has a high potential to migrate off post. This is for investigation/cleanup of the off post contamination and for the site or sites suspected of causing the contamination.

Y RAB Support

This category is used for installation administrative support for Restoration Advisory Boards (RAB). This category is not to be used for other community relations activities such as public meetings and must have a specific RCS-1383 report identifying RAB support requirements.

Z Notice of Violation (NOV), Consent Orders/Agreements

This category is to be used for efforts under Consent Orders/Consent Agreements to resolve NOVs or other enforcement actions for failure to perform a DERA-eligible restoration activity, i.e., RCRA corrective action, UST removal, or state laws. All NOVs MUST be properly reported to SFIM-AEC-EC and SFIM-AEC-IR in order to obtain this priority. Narrative must include NOV date.

a RDTE

Provides for the minimum essential level of funding as authorized by DoD for RDTE.

b Two Party Restoration Agreement W/State (DA-level)

This category is for projects being conducted under a two-party DAlevel signed agreement between the Army and a State Regulator.

c Non-NPL Remedial Actions

For remedial actions at non-NPL sites with approved decision documents.

e NPL Sites w/IAG but No Regulator Approved Schedule

- f NPL Sites with no IAG
- Q Non-NPL Sites on NPL Installations with IAGS
- h RCRA Corrective Action at Chem Demil Installations

Studies at installations where chemical demilitarization is part of the designated mission and requirements are identified in the corrective action section of a RCRA permit. All corrective action sections of RCRA permits must be reported to SFIM-AEC-IRP.

i RCRA Corrective Action at non-Chem Demil Installations

Studies at installations with requirements identified in the corrective action section of a RCRA permit without a chemical demilitarization mission. All corrective Action sections of RCRA permits must be reported to SFIM-AEC-IRP.

j UST Removals

For UST and surrounding soil removal projects only. Plume definition and site investigation will be prioritized independently and placed in the work plan based on their merit. Cannot be used if removal is incidental to replacement.

- k Special Considerations
  - Non-NPL Sites on NPL Installations without IAG
  - Proposed NPL Installations without IAG
  - Compliance with State restoration laws, permits or licenses with restoration requirements
- 1 4th Quarter Awards

This category is for projects identified as fourth quarter awards.

m Continuity Projects - Normal Progression

This category refers to installations or sites where there is no Federal or State regulator driving a project, but where previous work has been done and information is available which justifies further progression. The normal IRP progression of PA/SI, RI/FS, RD/RA, and monitoring is followed.

n Excessing Action

This category is for excessing projects requesting DERA funding and for projects that do not meet requirements for a higher priority.

o Remainder of RDTE

Provides for the remainder of funding for RDTE, beyond minimal essential defined in PS code a.

s Remainder of Funding - THIS CATEGORY FOR AEC USE ONLY

This category will account for any differences between actual funding and the RCS-1383 requirements level.

t No Current Year Requirements

#### OPERABLE UNIT DEFINITION

Operable unit is a three digit field that has been added to the RCS-1383 Report data base to facilitate reporting requirements for sites listed on the National Priorities List (NPL). The amended Circular A-11 (1990) mandates additional reporting through the A-106 process at the operable unit level. The term "operable unit" is a term of art defined by EPA to provide a standardized framework for measuring progress at its own NPL sites as well as those of other responsible parties including Federal Agencies. Installations identifying requirements using the RCS-1383 Report for projects at sites listed on the NPL should contact their EPA on-scene coordinator to obtain the list of operable units at an installation. Normally operable units will have been identified in the IAG/FFA or FFCA.

The EPA's National Contingency Plan (NCP) defines operable unit as "discrete actions that comprise incremental steps to the final remedy". This requires that each specific action or response be reported as an operable unit. Activities defined at this level will be monitored as separate projects and reported to OMB as separate projects. An operable unit can be further defined as one of the following; a) a separate geographic area of treatment; b) a separate treatment technology in the same geographic area; or c) a separate phase of response (as described in the National Contingency Plan, 40 CFR 300). All activities meeting the above requirements should be reported as separate projects, identified at the operable unit level.

# POLLUTANT CATEGORY LIST FOR IRP 1383s

# SUPERFUND (SFND)

FEAS	Feasibility Study (Corrective Measures Study)
GWAT	Ground water
LISI	Listing Site Investigation
OPLM	Operating Units & Long Term Monit
PASI	Preliminary Assessment/Site Investigation
REMA	Remedial Action (Corrective Action)
REMD	Remedial Design
RIFS	Remedial Investigation/Feasibility Study
RINV	Remedial Investigation (RCRA Facility Investigation)
RMVA	Removal Action

### RESOURCE CONSERVATION AND RECOVERY ACT (RCRA)

USTS	Underground	l Storag	e Tanl	ss			
CORA	Corrective	Action	(Sect	3004	U	&	V)

# LIST OF ACRONYMS FOR IRP 1383s

	the control of the co
AEC	Army Environmental Center
AEHA	Army Environmental Hygiene Agency
CA	Corrective Action
CE	Corps of Engineers
CEHND	CE Huntsville Division
CEMP	CE Military Programs
CEMRK	CE Kansas District
CEMRO	CE Omaha District
CENAB	CE Baltimore District
CENAN	CE New York District
CENED	CE New England Division
CEORL	CE Louisville District
CEORN	CE Nashville District
CEPOD	CE Pacific Ocean Division
CESAM	CE Mobile District
CESAS	CE Savannah District
CENPS	CE Seattle District
CESPK	CE Sacramento District
CESWF	CE Fort Worth District
CESWT	CE Tulsa District
CHPPM	Army Center for Health Promotion and Preventive
	Medicine
CMS	Corrective Measures Study
DA	Department of Army
DOD	Department of Defense
EPRIEM	EPA Reimbursement
EXEC	Executing Agency
FOR	FORSCOM
FS	Feasibility Study
FY	Fiscal Year
GWT	Groundwater Treatment
INST	Installation
IRA	Interim Remedial Action
IRD	Interim Remedial Design
LITSPT	Litigation Support
M	Monitoring
MDW	Military District of Washington
NOV	Notice of Violations
OGA	Other Government Agencies
M&O	Operation and Maintenance
P	Priority
PA	Preliminary Assessment
PMRMA	Program Manager for Rocky Mountain Arsenal

#### LIST OF ACRONYMS FOR IRP 1383s

#### Continued

PRJSPT Project Support

PRMMGT Program Management (MACOM only)

PGMSPT Program Support
PS Priority Sort Code

PYSA Prior Year Salaries and Administration/Salaries and

Review

RA Remedial Action

RAOPS Remedial Action Operations

RCRA Resource Conservation and Recovery Act

RD Remedial Design

REM Removal

RFA RCRA Facility Assessment RFI RCRA Facility Investigation

RI Remedial Investigation

RI/FS Remedial Investigation/Feasibility Study

RI/FSX Excessing Actions

RMIS Restoration Management Information System

SA Supervision and Administration

SFND Superfund

SIN Site Investigation STREIM State Reimbursement TBD To Be Determined

TRA TRADOC

USAF US Air Force

USGS US Geological Survey

W USARPAC

EXAMPLE RCS-1383 REPORTS

#### RCS DD-P&L 1383 REPORT PROJECT EXHIBIT

# **EXAMPLE -- MULTIPLE**SITES

MACOM: USATC SUBCOM

BSB: ASG: RECORD STATUS: ACTIVE
Date Entered: 11/01/90
Date Revised: 03/01/94

Date Discontinued:

Facility: Fort Dera City: New County Address: ATC-EN
FFID: NH-241012233 Owner Type: GOGO State: NH Country: USA EPA: 01 Contract: John Money

Support Installation: ZIP: 10000-4242 Telephone: 800-555-1212

Facility Type: Troop

Project Number: FTDE-91-S001

Local Project Number:

Project Name: GROUP A SITES

Survey or Mitigation: Survey

Project Assessment: H

Pollution Category: RIFS

Program Area: IRP

Initiation Reason: HEALTH

Operable Unit:

Local Project ID Type:

Class: I Law/Reg: SFND

Project Status: Planning

Instn Priority:

Pillar: RST

Year Funding Required: 91

Fiscal Year Completed:

Compliance Status: INOV

Must Fund: Y MACOM Priority:

Discontinue Reason:

Plan/Design Schedule Completion: 06/93 Work/Constr Scheduled Start: 07/93

Work/Const Scheduled Completion: 12/93
Final Compliance Required: 03/95

Fund Type:	DEI	RA - OMA							Total E	st. Cost:	3670	
AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY Required	Prg/Budt
					~~~~~							
439008.11	1991	490	490	480	439008.11	1996	5					
439008.11	1992	1400	1400	1250	439008.11	1997	,					
439008.11	1993	80	80	80	439008.11	1998	3					
439008.11	1994	1580	1580	580	439008.11	1999	)					
439008.11	1995	120			439008.11	2000	)					

Matrative: DOD P=1A PS Code = X DSERTS = 1,2,9,11,13,15-17 EXEC = NED CWA NOV, JAN 91 DISCHARGING TCE OFF-POST RIVER SOURCE - GW PLUME FORMER UST & OTHER SITES, RCRA CA NOV 92, FY94 RI, PYSA 20K (OCT) FS 1560K (FEB); FY95 FS 120K PYSA (1-40)

Marrative (Translated): The DOD risk based priority is high. The recommended Army priority sort code is X. The 8 sites are listed in the DSERTS and have equal risk priority. They will be investigated as a unit. The executor of the program is U.S. Army Corps of Engineers, New England Division. The notice violation of the NPDES permit, dated Jan 91 involves discharging TCE into the Connecticut River at the boundary. The most likely source is contaminated groundwater. The suspected sources are former underground storage tanks and possible contribution from all sites. A RCRA permit with a corrective actions section was issued Nov 92. In FY94, 20K is needed in October for prior year salaries and administration of the RI contract and 1560K is needed in Pebruary for award of the FS. In FY95, 120K needed in the beginning of each quarter for salaries and administration in support of the FS contract that was awarded in the prior year. This project will be completed in FY95.

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#### RCS DD-P&L 1383 REPORT PROJECT EXHIBIT

**EXAMPLE** --REMEDIAL ACTION & INTERIM ACTION

MACOM: USATC SUBCOM

BSB: ASG: RECORD STATUS: ACTIVE Date Entered: 11/01/90

Date Revised: 03/01/94

Date Discontinued:

Facility: Fort Dera

City: New County

Address: ATC-EN

FFID: NH-241012233 Owner Type:

State: NH Country: USA EPA: O1

Contact: John Money

Support Installation:

ZIP: 10000-4242

Telephone: 800-555-1212

Facility Type: Troop

Project Number: FTDE-92-5002

Pillar: RST

Local Project Number:

Operable Unit:

Year Funding Required: 91

Project Name: DSERTS 18, WATER DIS PT Local Project ID Type: Survey or Mitigation: MITIGATION

Fiscal Year Completed:

Project Assessment: H

Class: I Law/Reg: SFND

Compliance Status: INOV

Pollution Category: REMA

Project Status: DESIGN

Program Area: IRP

Must Fund: Y MACOM Priority:

Initiation Reason: HEALTH

Instn Priority: 1

Discontinue Reason:

Plan/Design Schedule Completion: 12/92 Work/Constr Scheduled Start: 03/93

Work/Const Scheduled Completion: 12/94

Final Compliance Required: 12/92

Fund Type: DERA - OMA

Total Est. Cost: 3670

AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS	Code	FY	Required	Prg/Budt
439008.11	1993	288	288	260	439008.11	1998	220							
439008.11	1994	680	680	100	439008.11	1999	434							
439008.11	1995	2701			439008.11	2000	434							
439008.11	1996	220			439008.11	2001	434							
439008.11	1997	220			439008.11	2002	434							

Narrative: DOD P=1A, PS Code = X DSERTS = 18 EXEC = NED CWA NOV, JAN 91 DISCHARGE TCE OFF-POST RIVER SOURCE - Former UST plume, RCRA CA NOV 92, FY94 IRD 20K (OCT) PYSA, IRA 360K (DEC) RD 200K (NOV) LTM 100K (OCT), FY95 RA 2,376K (OCT), LTM 210K (JAN) OGM 115K (SEP), FY96-FY98 M 100K OGM 120K EACH OCT, FY97-02 M 100K OGM 130K (1Q EA YR)

Narrative (Translated): The DOD risk based priority is high. The recommended Army priority sort code is X. The ground water discharge site (DSERTS 18) listed in the DSERTS will be investigated. The executor of the program is U.S. Army Corps of Engineers, New England Division. The violation of the NPDES permit involves discharging TCE into the Connecticut River at the boundary. The most likely source is contaminated ground water emanating from former underground storage tanks. A RCRA permit with corrective actions was issued in Nov 92. In FY94, 20K is needed in October for the salaries and administration for the interim remedial design awarded in the prior year, 360K is needed in December for the interim remedial action, 200K is needed in November for the final remedial design, and 100K is needed in October for ground water monitoring. In FY95, 2,376K (Oct), is needed for the remedial action, 210K is needed in January for long term monitoring, 115K is needed for operation and maintenance. In FY96 through FY98 100K is needed each October for monitoring and 120K for operation and maintenance. In FY97 through FY2002 100K for monitoring and 130K for operation and maintenance will be need first quarter each year.

# **EXAMPLE** --**CORRECTIVE ACTION** & MULTIPLE **EXECUTORS**

#### RCS DD-PGL 1383 REPORT PROJECT EXHIBIT

MACOM: USATC SUBCOM

BSB: ASG: RECORD STATUS: ACTIVE Date Entered: 11/01/90

Date Revised: 03/01/94

Date Discontinued:

Facility: Fort Dera

City: New County

Address: ATC-EN

FFID: NH-241012233 Owner Type: GOGO

State: NH Country: USA EPA: 01

Contact: John Money

Support Installation:

ZIP: 10000-4242

Telephone: 800-555-1212

Facility Type: Troop

Project Number: FTDE-92-S003

Operable Unit:

Pillar: RST

Local Project Number:

Year Funding Required: 95

Project Name: LANDFILL, FTDE-005 Survey or Mitigation: MITIGATION

Local Project ID Type:

Fiscal Year Completed:

Project Assessment: H

Class: II Law/Reg: SFND

Pollution Category: REMD

Initiation Reason: HEALTH

Project Status: DESIGN

Compliance Status: CMPA

Program Area: IRP

Instn Priority: 1

Must Fund: Y MACOM Priority:

Discontinue Reason:

Plan/Design Schedule Completion: 09/95 Work/Constr Scheduled Start: 10/95

Work/Const Scheduled Completion: 12/97 Final Compliance Required: 01/98

Fund Type: DERA - OMA

Total Est. Cost: AMS Code FY Required Prg/Bdgt Obligated AMS Code FY Required Prg/Bdgt Obligated AMS Code FY Required Prg/Budt

182 439008.11 1994 200 439008.11 1999 182 439008.11 1995 2000 439008.11 2000 182 439008.11 2001 182 439008.11 1996 182 439008.11 2002 182 439008.11 1997 439008.11 1998 182 439008.11 2003 182

Narrative: DOD P = 2B PS Code = i or K, DSERTS = 5 EXEC = NED RCRA CA NOV 92, FY94 300K RI/FS (OCT), 200K RD (JUN), PRESUMPTIVE REMEDY -- FY95 2000K (OCT), COMPLIANCE REQUIRED FY97, FY96 RA PYSA 50K, EXEC = INST LTM 182K, FY97-04 LTM 182K

Marrative (Translated): The DOD risk based priority is medium. The recommended priority sort code is i. However the site has been identified in the IAP and could be accelerated as K. The Old Sanitary Landfill is DSERTS 5. The executor of the program is U.S. Army Corps of Engineers, New England Division. A RCRA permit with corrective actions was issued in Nov 92. Presumptive remedy is being pursued. The Compliance Deadline is 1997. In October of FY94 300K was needed for the RI/FS and 200K is needed in June for the remedial design. In October FY95, 2000K is needed for the remedial action. 50K will be needed in FY96, first quarter for prior year salaries and administration by New England. Also 182K is needed by the installation for the long term monitoring program. In FY97-FY02, 182K is needed by the installation for long term monitoring.

#### RCS DD-P&L 1383 REPORT PROJECT EXHIBIT

MACOM: USATC

SUBCOM

BSB: ASG: RECORD STATUS: ACTIVE Date Entered: 11/01/90

Date Revised: 03/01/94

Date Discontinued:

Facility: Fort Dollar

City: New County

Address: ATC-EN

FFID: KS-241012001 Owner Type:

State: KS Country: USA EPA: O1

Contact: John Nickel

Support Installation:

ZIP: 10000-4242

Telephone: 800-555-1212

Facility Type: Troop

Project Number: FTDB-92-S004

Local Project Number:

Operable Unit:

Pillar: RST

Project Name: Fuel Area, FTDO-008

Local Project ID Type:

Year Funding Required: 93

Survey or Mitigation: MITIGATION

Fiscal Year Completed:

Project Assessment: H

Class: II Law/Reg: SFND

Compliance Status: CMPA

Pollution Category: REMD

Initiation Reason: HEALTH

Project Status: DESIGN

Must Fund: Y

Program Area: IRP

Instn Priority:

MACOM Priority:

Discontinue Reason:

Plan/Design Schedule Completion: 09/93

Work/Const Scheduled Completion: 12/95

Work/Constr Scheduled Start: 10/94

Final Compliance Required: 03/96

Fund Type:	DE	RA - OMA							Total E	st. Cost:			
AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY	Required	Prg/Budt
439008.11	1993	150	150	150	439008.11	1998	90						*
439008.11	1994	505	305	50	439008.11	1999	90						
439008.11	1995	258			439008.11	2000	90						
439008.11	1996	3000			439008.11	2001	90						
439008.11	1997	90			439008.11	2002	90						

Narrative: DOD P = 2A PS Code = g DSERTS = 8 EXEC = INST, NON-NPL ON NPL W/IAG, FY94 RI 5K(OCT), FS 500K(JUL), FY95 RD 258K (JAN), FY96 RA 300K, FY97-02 LTM 90K

Narrative (Translated): The DOD risk based priority is medium. The recommended priority sort code is g. The Fuel Area is DSERTS 5. The executor of the program is the installation. This site is not part of the NPL listing but included in the IAG as a RCRA site. In-house support money, 5K will be needed in October of FY94 for the RI. 500K will be needed in July for the feasibility study. The design will start in January FY95 for 258K. The remediation will be completed in FY96 for 3,000K. For FY97-02 long term monitoring is estimated at 90K per year.

#### **EXAMPLE -- NPL**

#### RCS DD-PGL 1383 REPORT PROJECT EXHIBIT

MACOM: USATC SUBCOM

BSB: ASG: RECORD STATUS: ACTIVE Date Entered: 11/01/90

Date Revised: 03/01/94

Date Discontinued:

Facility: Fort Door

City: Chicago

Address: ATC-EN

FFID: IL-241014242 Owner Type: GOGO State: IL Country: USA EPA: 05 Contact: Elwood Blues

Support Installation:

ZIP: 10000-4242

Telephone: 800-555-1212

Facility Type: Troop

Project Number: FTDE-92-S005

Operable Unit:

Pillar: RST

Local Project Number:

Year Funding Required: 93

Project Name: Disposal Pit, FTDO-009

Local Project ID Type:

Fiscal Year Completed:

Survey or Mitigation: MITIGATION Project Assessment: H

Class: II Law/Reg: SFND

Compliance Status: CMPA

Pollution Category: REMD

Project Status: DESIGN

Program Area: IRP

Must Fund: Y

Initiation Reason: HEALTH

Instn Priority:

MACOM Priority: Discontinue Reason:

Plan/Design Schedule Completion: 09/95 Work/Constr Scheduled Start: 10/96

Work/Const Scheduled Completion: 8/97 Final Compliance Required: 12/97

Fund Type:	DEI	RA - OMA						Total E	st. Cost:		
AMS Code	FY	Required	Prg/Bdgt	Obligated	AMS Code	FY Required	Prg/Bdgt	Obligated	AMS Code	FY Required	Prg/Budt
439008.11	1993	30	30	29	439008.11	1998	0				
439008.11	1994	2	2		439008.11	1999	0				
439008.11	1995	460			439008.11	2000	0				
439008.11	1996	0			439008.11	2001	0				
439008.11	1997	0			439008.11	2002	0				

Narrative: DOD P = 1A PS Code = V DSERTS = 9 EXEC = INST, NPL W/IAG-91 FY94 2K RD (OCT), FY95 REM 300K (DEC), 100K RA (APR)

Narrative (Translated): The DOD risk based priority is high. The recommended priority sort code is V. The Disposal Pit is DSERTS 9. The executor of the program is the installation. The installation is listed on the NPL and has an IAG. The IAG was signed in 1991. In October FY94, 2K will be need for the decision document. In FY 95, the disposal pit contents will be removed in December for 300K. Additional remedial action will be completed in April for 100K. No additional work is planned at this site.

# **EXAMPLE -- NEW DSERTS** & SPECIAL CONSIDERATION

#### RCS DD-PGL 1383 REPORT PROJECT EXHIBIT

MACOM: USATC SUBCOM

BSB: ASG: RECORD STATUS: ACTIVE Date Entered: 11/01/90 Date Revised: 03/01/94

Date Discontinued:

Facility: Fort Dera

City: New County

Address: ATC-EN State: NH Country: USA EPA: 01 Contact: John Money

FFID: NH-241012233 Owner Type: GOGO

Support Installation:

ZIP: 10000-4242

Telephone: 800-555-1212

Facility Type: Troop

Project Number: FTDE-92-S006

Operable Unit:

Pillar: RST

Local Project Number: Project Name: Greenhouse UST, #15

Local Project ID Type:

Year Funding Required: 95

Survey or Mitigation: MITIGATION

Fiscal Year Completed:

Project Assessment: H

Class: II Law/Reg: RCRA Compliance Status: CMPA

Pollution Category: USTS

Initiation Reason: HEALTH

Project Status: DESIGN

Program Area: IRP

Instn Priority:

Must Fund: Y MACOM Priority: Discontinue Reason:

Plan/Design Schedule Completion: 09/96 Work/Constr Scheduled Start: 10/96

Work/Const Scheduled Completion: 12/97 Final Compliance Required: 1/98

Fund Type: DERA - OMA

Total Est. Cost:

FY Required Prg/Bdgt Obligated AMS Code FY Required Prg/Bdgt Obligated AMS Code FY Required Prg/Budt

439008.11 1994 30 439008.11 1995 400 0 439008.11 1997 439008.11 1998 O 0 439008.11 1999

Narrative: DOD P = 3B PS Code = k, new DSERTS = 15 EXEC = NED NH UST Reg, Tank abandonned 1984. FY94 RD 30K (MAY), FY95 RA 400K (MAR)

Narrative (Translated): The DOD risk based priority is low. The recommended priority sort code is k. The Former Greenhouse UST has not been previously identified in DSERTS. It is now assigned as FTDE-015. The executor of the program is U.S. Army Corps of Engineers, New England Division. A New Hampshire UST law requires remediation. In FY 94, the design will be started in-house during May for 30 K. The final removal will start in March FY 95 for 400K.

# ATTACHMENT C

FORMAT FOR IRP WORK PLAN CHANGES

ATTACHMENT C
MACOM CHANGES TO THE FY95 IRP WORK PLAN DATED XX XX 95

# FORT DERA

Line			Project		Exec			Award	
Item	WP ID#	Project Title	Status	PS	Agcy	Funds	1383#	Status	Remarks
108	94-1004	SWMU Investigation	SI/SA	D	CEORN CEORL	77	FTDA93-072	A	
282	94-1000	Former Shell Washout	REM SI	K 9	CEORN	375	FTDA92-054	3	
FORT	RAB								

Line			Project		Exec			Award	
Item	WP ID#	Project Title	Status	PS	Agcy	Funds	1383#	Status	Remarks
1154	94-1544	TNT Lagoon Area	RA RD	С	CEMRK	600 300	FTRB91S033	2	
117	94-1541	TNT Lagoon Area	RA/SA	D	CEMRK	60	FTRB915033	2	Delete LI
NEW		Old Landfill	RI/FS	m	AEC	800	FTRB91S033	2 1	lew Project

# ATTACHMENT D

STANDARD FORMAT FOR DOD IN-PROGRESS REVIEW
PROJECT STATUS SUMMARIES

# ATTACHMENT D

# DOD IN-PROGRESS-REVIEW PROJECT STATUS SUMMARY

Service: <u>U.S. Army, (Enter MACOM)</u>	
Installation:	
Approved IRP Work Plan ID Number:	
Cleanup Phase:	
Cost: Estimated	Actual
Quarter Obligated: Scheduled	Actual
Type of Legal Requirement:	
Milestone Description:	
Milestone Date:	
Site Type:	
Future Land Use:	n og tigger og til ekkinke grække <sup>t</sup> til en kologisk og til en hæget. <del>Det skilder og til ekkinke til en til en</del>
Future Land Use Considered in Determining	ng Remedy: Yes No
Major Contaminant:	
Major Technology Employed:	
Dresumntive Remedy: Yes No	

# ATTACHMENT E

GENERIC MEMORANDUM OF AGREEMENT

#### ATTACHMENT E

#### MEMORANDUM OF AGREEMENT BETWEEN

(EXECUTOR) AND (INSTALLATION)
RELATING TO PROCEDURES FOR THE (INSTALLATION)
DEFENSE ENVIRONMENTAL RESTORATION PROGRAM

I. PURPOSE: The purpose of this memorandum is to specify the roles and responsibilities for cooperation and extent of support which the (EXECUTOR) will provide (INSTALLATION) in the environmental investigation, design and clean up of selected sites at (INSTALLATION), (STATE) under the Defense Environmental Restoration Program (DERP).

This memorandum will arrange for the <u>(EXECUTOR)</u> to provide technical assistance, contract management, and related services required by <u>(INSTALLATION)</u> to execute specific Army Active Sites Installation Restoration Program (IRP) tasks. All tasks will be performed by the <u>(EXECUTOR)</u> in accordance with Army IRP and installation guidance, prepared in consultation with appropriate regulators and completed, to include interim deliverables, by installation negotiated deadlines.

This memorandum does not replace assigned responsibilities to current laws, regulations and Army policy and guidance under the DERP.

#### II. AUTHORITY:

- A. Commander, (INSTALLATION) is responsible for environmental restoration of sites on the installation and maintains final authority for all proposed action decisions.
- B. Commander, (INSTALLATION) assigns project execution to the (EXECUTOR) for activities required for environmental restoration. Examples of required activities are project planning documents, preliminary assessments, site inspections, site investigations, remedial investigations, feasibility studies, remedial designs, remedial actions, and development of long term operation and maintenance requirements.
- C. The DERP provides for the clean up of Department of Defense (DOD) hazardous waste sites consistent with the provisions of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986 (SARA), Section 211, the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) (40 CFR 300) and Executive Order 12580,

Superfund Implementation. The DERP is funded by a special transfer account, the Defense Environmental Restoration Account (DERA) established by 10 USC 2703.

D. The IRP is a comprehensive program to identify, investigate and clean up contamination associated with past Army activities using DERA funds. The IRP is conducted consistent with the process described in the NCP, 40 CFR 300.61-300.70, and if applicable, consistent with the substantive requirements of the Resource Conservation and Recovery Act (RCRA) corrective action process. The IRP will comply with federal, state, regional and local requirements applicable to the clean up of hazardous materials contamination.

#### III. RESPONSIBILITIES:

### A. The (EXECUTOR) will:

- 1. Assign a Project Manager to be the primary point of contact between (INSTALLATION) and the (EXECUTOR) for execution of (EXECUTOR's) portion of the (INSTALLATION) IRP. The (EXECUTOR) Project Manager will serve under the authority and direction of the (INSTALLATION) Project Manager in accordance with specific tasks.
- 2. Provide estimates of costs and time requirements for performance of specific tasks forwarded by the <u>(INSTALLATION)</u> Project Manager. The estimates will include in-house costs, specific contract and pricing data, and costs charged for contract supervisory and administrative services.
- 3. Propose schedules for all deliverables and accomplish all tasks within time deadlines set forth by (INSTALLATION). Tasks will not be considered complete until reviews are prepared for all work performed and accepted by the (INSTALLATION) Project Manager.
- 4. Obtain the concurrence of the <u>(INSTALLATION)</u> Project Manager on all interpretations of statutes and regulations cited by either party to this agreement that may effect performance of a task.
- 5. Recognize the <u>(INSTALLATION)</u> Project Manger as the sole point of interface with all environmental regulators, report any contacts by regulators immediately to the <u>(INSTALLATION)</u> Project Manager and attend all meetings as directed by the <u>(INSTALLATION)</u> Project Manager.
- 6. Provide (INSTALLATION) Project Manager any and all available information on a task, as requested.

- 7. Immediately notify the <u>(INSTALLATION)</u> Project Manager of any impediment to completion of a task on or before the scheduled deadline and at or below the stated costs.
- 8. Provide information as requested by the deadline set forth in the request, or seek and obtain an extension.
- 9. Request from (INSTALLATION) specific approval before release for publication of any information gathered under this agreement. The (EXECUTOR) will not release any information concerning the (INSTALLATION) restoration program to parties outside this agreement without written approval from (INSTALLATION).

## B. (INSTALLATION) will:

- 1. Assign a Project Manager designated by the Commander, (INSTALLATION) to ensure all work is accomplished in accordance with regulatory, DOD and Army policy. The (INSTALLATION) Project Manager will be the primary point of contact between the (INSTALLATION) and the (EXECUTOR). The (INSTALLATION) Project Manager will assign tasks to the (EXECUTOR) describing the general scope of activities and provide project criteria, goals and general milestones for restoration work.
- 2. Program necessary funds through RCS 1383 reports with estimates of cost and time requirements for performance of specific tasks forwarded by the (EXECUTOR) Project Manager.
- 3. Approve proposed schedules and deadlines for all tasks and deliverables. Provide comments and approvals to the (EXECUTOR) on items such as scopes of work and project documents in accordance with approved schedules.
- 4. Provide guidance to the <u>(EXECUTOR)</u> concerning all interpretations of statutes and regulations cited by either party to this agreement that may effect performance of a task and document any deviations from DOD or Army policy. The <u>(INSTALLATION)</u> Project Manager is responsible for obtaining concurrence with the major Army command (MACOM) and major subordinate command (MSC) of any deviations from policy and quidance.
- 5. Communicate and negotiate with environmental regulators and be the sole point of interface with all regulators. The (INSTALLATION) Project Manager will invite the (EXECUTOR) to attend regularly scheduled meetings with regulators and other meetings as appropriate.
- 6. Provide all necessary available project information to the (EXECUTOR) Project Manager to ensure task completion.

- 7. Coordinate with the (EXECUTOR) Project Manager to resolve any impediment to completion of the task on or before the stated deadlines and at or below the stated costs. If the (EXECUTOR) fails to meet a deadline resulting in a penalty to the Army, the (INSTALLATION) Project Manager is responsible for notifying their MACOM and the Army Environmental Center (the Army's central program manager for the IRP) of the penalty and any associated costs.
- 8. Provide the <u>(EXECUTOR)</u> Project Manager with guidance on additional tasks not identified in the general scope of assigned activities. If a task is time critical, the <u>(INSTALLATION)</u> Project Manager will so state with reasons and establish a suspense date for a response.
- 9. Coordinate and communicate with the MACOM/MSC. The (INSTALLATION) Project Manager will:
- (a) submit Installation Action Plans, Restoration Management Information System updates, RCS 1383 reports and related changes to the MACOM/MSC,
  - (b) coordinate meetings for MACOM/MSC attendance, and
- (c) provide copies of schedules and deliverables as appropriate.
- 10. Develop and revise Installation Action Plans (IAPs) in coordination with the <u>(EXECUTOR)</u> Project Manager or assign the in-house development of the IAP and the annual update of the document to the <u>(EXECUTOR)</u> Project Manager.
- 11. Update the Restoration Management Information System (RMIS) with input from the (EXECUTOR).
- 12. Execute the Community Relations Program, develop a Restoration Advisory Board (RAB), chair the Technical Review Committee and establish and maintain the public repository and administrative record as appropriate.
- 13. Provide appropriate funds, in coordination with their MACOM/MSC, to the (EXECUTOR) for all work required to accomplish the tasks. (INSTALLATION), is responsible for implementation of DERA eligible projects, including funding requirements and reporting through the Army Environmental Center, in accordance with Army funds request policy and guidance.

#### IV. FUNDING

- A. DERA funds are distributed to Army appropriations from the DOD Transfer Account. Within the Army, all DERA eligible tasks are prioritized in accordance with the Army priority system. When the task is ready for award, (INSTALLATION) will request the Army Environmental Center (subject to MACOM/MSC concurrence) direct funds via a Military Interdepartmental Purchase Request (MIPR) or Work Authorization Document (WAD) to the financial point of contact at the (EXECUTOR).
- B. Any modification to the basic request will be provided through the funding request procedures in paragraph A above.
- C. The requirement for the payment or obligation of funds under this agreement is subject to the availability of appropriated funds, and no provision herein shall be interpreted to require obligation or payment of funds in violation of the Anti-Deficiency Act, 31 U.S.C. 1341. In cases where payment or obligation of funds would constitute a violation of the Anti-Deficiency Act, the dates established requiring the payment or obligation of such funds shall be appropriately adjusted.

### V. EFFECTIVE DATE, AMENDMENT AND TERMINATION:

- A. The terms of this agreement shall apply to and be binding upon signature to this agreement and be in effect for a period of 5 years from the last signature date. Two years after implementation, all parties will determine whether the agreement should continue. Upon mutual agreement of all parties, the agreement can be extended by amendment for a period of time not to exceed 5 years.
- B. This agreement may be modified by mutual consent of all parties or may be terminated by (INSTALLATION) or the (EXECUTOR) with a thirty day written notice to the other party, except for critical activities which require a longer period of time. A critical activity is defined as an activity undertaken by the (EXECUTOR) for (INSTALLATION) for which (INSTALLATION) has a pressing need which cannot be satisfied within a thirty day period. In the event of termination of this agreement by (INSTALLATION), (INSTALLATION) shall reimburse the (EXECUTOR) for all reasonable costs (including costs related to terminating outstanding obligations) incurred by the (EXECUTOR) to the extent that such costs have not been previously reimbursed.

### RESOLUTION OF DISPUTES:

The below signed parties will work to successfully implement this agreement in their respective organizations. Disputes under this agreement will be resolved, if possible, by the (INSTALLATION)

Project Manager and the (EXECUTOR) Project Manager. Unresolved

issues will then be raised to (EXECUTOR) Commander/District government agencies). If agr Commander, (INSTALLATION) is disputes.	the Commander, (1) Engineer (or equineement cannot be m	valent for other ade, the
VII. APPROVING PERSONNEL:		
INSTALLATION		

					* .		
Installa	tion Co	mmander		<del></del>	Date		
Chief, E	Invironm	ental C	ffice		Date		
EXECUTOR	<u>.</u>						
					٠٠		
Commande	er/Distr	ict Eng	gineer		Date	ries)	

# ATTACHMENT F

STANDARD FORMAT FOR A FUNDING REQUEST

MEMORANDUM THRU (MACOM)		Date			
FOR Commander, USAEC, 1	ATTN: SFIM-AEC	-RMB, APG, MD 21010-5401			
SUBJECT: DERA Funding Reque	st for				
Project Title:					
1383 Number:		Phase: ID#			
Torkplan Line # & Date:		ID#			
Executor Information:	*For contract	s circle one: Negotiated / Estimate			
USAEC/Inst./OGA		COE Fund Issue			
\$		\$Contract*			
<u>\$</u>		\$Inhouse/Scope			
\$	OGA	\$Contract Admir			
\$	Total	\$Total			
		Pear Code			
Contractor Name:					
Contract No.:		Summary of Statement of Work:			
OGA Name:					
Date Funds Required:					
Period of Performance: _					
Contract Award Date:					
Inst. Tech. POC:					
Address:					
Phone No.	the state of the s				
		Summary Government Cost Estimate:			
FAX No.:					
Exec. Tech. POC:					
Address:					
Phone No.:					
FAX No.:					
Procurement POC:					
Address:		Justification for Increase:			
Phone No.:					
FAX No.:	<del></del>				
Financial POC:					
Address:					
95 37 -					
Phone No.:					
FAX No.:	· · · · · · · · · · · · · · · · · · ·				
Installation POC:		Date:			
MSC Concur/Nonconcur:		Date:			
MACOM Concur/Nonconcur:		Date:			
APC Congue (Noncongue.					

# ATTACHMENT G

DECISION DOCUMENT OUTLINE

### **DECISION DOCUMENT**

### OUTLINE

1. PURPOSE	OF REMEDIAL	. ACTION	(INTERIM	REMEDIAL	. OR (	CORREC	LINE 1	ACTIC	)N)
------------	-------------	----------	----------	----------	--------	--------	--------	-------	-----

This decision document describes the remeremedial action or corrective action) for the(remedial action) chosen in accordance with the transfer of the corrective action.	name of site)site at
SARA, the NCP, RCRA, and AR 200-1, as applicab	
Give a brief description and explanation of the site a risk to human health and the environment. Briefly ex eliminate or reduce the risk to human health and th (1 paragraph)	xplain how the selected action will
This decision document was developed by support from (State or EPA). Letters from (principles) are attached (if available	s of concurrence(or signatures)

### 2. SUMMARY OF SITE RISK

This section should briefly describe the results of any risk assessments or risk considerations at this site. Discussion should, at a minimum, address both Human Health Risks and Ecological Risk based on the contamination at the site, exposure pathways, known or potential health or ecological effects of contaminant, and overall risk which could result from the contamination at the site if no remedial action were taken.

(1-2 paragraphs)

### 3. SUMMARY OF REMEDIAL ALTERNATIVES

This section should describe the remedial alternatives, the selected remedial alternative, and a brief explanation/rationale of why the remedial method was selected. At a minimum, this section should briefly cover how this action fits into the overall site cleanup strategy, cost of alternative(s), description of the selected technology, and the expected goals or long-term effectiveness of the remedy. (1-2 paragraphs)

If desired, or deemed necessary, also reference any technical documents supporting this decision, i.e., "The alternative(s) summarized here are described in the remedial investigation and feasibility study (RI/FS) report dated\_\_\_\_\_ which should be consulted for a more detailed description of all the alternatives"

# 4. PUBLIC/COMMUNITY INVOLVEMENT

This section should summarize the installations/sites community involvement program. At a minimum, describe any past community participation, and what steps will be taken in the future to facilitate public involvement. Please note that any future community involvement program at the installation shall conform with all applicable laws and DOD and Army Policy. For example:

"It is DOD and Army policy to involve the local community as early as possible and throughout the IR process at an installation. To accomplish this, \_\_(site name) \_\_\_\_\_ has/is complying with the public participation requirements of CERCLA/SARA (Sections 113(K)(2)(A) and 117...(or other as applicable) and DOD and Army Policy by \_\_\_ (describe public involvement) \_\_\_\_\_. Future community involvement at \_\_(site) \_\_\_\_ will consist of \_\_\_\_\_ (for future community involvement-see references) \_\_\_\_\_.(Army RAB Guidance dtd 4/14/94, DOD DERP Management Guidance, dtd 4/14/94 Section XII, pg.18......)

(1-2 paragraphs)

#### 5. DECLARATION

See attached declaration statements. Choose the declaration statement that best describes the site and situation.

### 6. SIGNATURE PAGE

The appropriate signature for the Army is based on the cost of the action described in the decision. The signature authority for the Army is as follows:

• For actions up to 2 million dollars the Installation Commander (IC) is the signature authority

• For actions in the range of 2 million to six million dollars the MACOM in conjunction with the IC is the signature authority

• For all actions over 6 million dollars the decision document must be submitted through the Army chain of command to the appropriate signing authority.

- For Non-NPL actions over 6 million dollars the Director of Environmental Programs (DEP) is the signature authority.

- For NPL actions over 6 million dollars the Deputy Assistant Secretary of the Army, for Environment, Safety and Occupational Health (DASA (ESOH) is the signature authority where other Federal Facility Agreement (FFA) signatories are signing. If no other signatories of the FFA are approving the Decision Document, then the DEP is the signing authority.

• The DASA(ESOH) will approve and sign in conjunction with the IC, all decision documents concerning an off-post response.

A copy of all decision documents must be provided to the U.S. Army Environmental Center.

### **DECLARATION STATEMENTS-SECTION 5**

When the selected remedy satisfies the statutory preference for treatment as a principal element, by treating at least the principal threat(s) posed by the site, the declaration should state:

I. "The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy satisfies the statutory preference for remedies that employ treatment that reduces toxicity, mobility or volume as a principal element and utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable."

When the selected remedy for the site involves little or no treatment to reduce toxicity, mobility or volume of contaminants, that is, treatment is not utilized to address the principal threat(s) posed by the site, CERCLA requires a statement explaining why such a remedial action is not chosen. The declaration in this case should state:

II. "The selected remedy is protective of human health and the environment, attains Federal and State requirements that are applicable or relevant and appropriate to this interim remedial action (or removal) [or "a waiver can be justified for the Federal or State applicable or relevant and appropriate requirement that will not be met"], and is cost effective. This remedy utilizes permanent solutions and alternative treatment (or resource recovery) technologies to the maximum extent practicable for this site. However, because treatment of the principal threats of the site was not found to be practicable [or "within the limited scope of this action"], this remedy does not satisfy the statutory preference for treatment as a principal element of the remedy." This must be followed by the rationale for this finding based on the specific factors used to determine that treatment is either impracticable or not within the limited scope of this action. In addition, a brief statement that past or future operable units will meet the statutory preference for treatment should be included when appropriate.

If the remedy will leave hazardous substances on-site above health-based levels, the Declaration should include the following:

III. "Because this remedy will result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, a review will be conducted within five years after commencement of remedial action to ensure that the remedy continues to provide adequate protection of human health and the environment."

If the remedy will not leave hazardous substances on-site above health-based levels, the Declaration should include the following:

IV. "Because this remedy will not result in hazardous substances remaining on-site above levels that allow for unlimited use and unrestricted exposure, the five-year review will not apply to this action".

# ATTACHMENT H

# EXAMPLE OF A RESTORATION ADVISORY BOARD

SUPPORT RCS-1383 REPORT

RCS DD-P&L(A) 1383 REPORT PROJECT EXHIBIT ATTACHMENT H

BSB: ASG: MACOM: DA SUBCOM:

Record Status: ACTIVE Date Entered: 01/31/94

Date Revised: 03/18/94

Date Discontinued:

Installation: Ft. RAB

Address: RABS-RES City: Abingdon

FFID: MD-323266072 Owner Type: GOCO State: MD Country: USA EPA: 03 Contact: ROBIN STEIN

Telephone: 410-671-8000

Zip: 210092022

Support Installation:

Facility Type: RESEARCH & TESTING

Project Number: RAB-R001

Operable Unit:

Local Project ID Type: Local Project Number:

Year Funding Required: 1994

Piller:

Project Name: SUPPORT FOR INSTALLATION RESTORATION ADVISORY BOARD

Fiscal Year Completed:

Survey or Mitigation:

Class: 3 Law/Reg: SFND Project Assessment: H

Compliance Status: OTHR

Project Status: ON-GOING

Must Fund: N Pollution Category: RIFS

Program Area: ACTIVE - INSTALL, RESTORATION

MACOM Priority:

Initiation Resson:

Discontinue Reason:

Instn Priority:

Work/Const Scheduled Completion: 10/98

Work/Constr Scheduled Start:

Plan/Design Scheduled Completion: /

Final Compliance Required:

Total Est. Cost: 215 Pund Type: DERA - OMA

AMS Code FY Required Prg/Bdgt Obligated AMS Code FY Required Prg/Bdgt Obligated AMS Code FY Required Prg/Bdgt Obligated £ 0 788008.11 1995 788008.11 1996 7788008.11 1997 788008.11 1998

Narrative:

FUNDS NEED TO SUPPORT INSTALLATION PUBLIC AFFAIRS OFFICE IN THE INCREASED WORK LOAD AND DIRECT COSTS REQUIRED TO SUPPORT THE INSTALLATION RESTORATION ADVISORY BOARD

### ATTACHMENT I

LIST OF AVAILABLE IRP GUIDANCE

#### ATTACHMENT I

### LIST OF AVAILABLE IRP GUIDANCE

- 1. Army Regulation 200-1, Environmental Protection and Enhancement, Headquarters, Department of Army, 23 April 1990 (Currently being revised).
- 2. Memorandum, ODUSD(ES), 14 Apr 94, subject: Management Guidance for Execution of the FY 94/95 and Development of the FY96 Defense Environmental Restoration Program.
- 3. U.S. Army Installation Restoration Program Guidance Manual, U.S. Army Environmental Center, December, 1993, 2nd Revision.
- 4a. Policy and Guidance for Identifying U.S. Army Environmental Program Requirements, U.S. Army Office of the Director of Environmental Programs, Volume II, July 1993 (Currently being revised).
- b. 1383 Data Base Management (DB1383), User's Manual DB1383 Version 2.71, U.S. Army Environmental Center, 7 Apr 93.
- 5a. The Defense Site Environmental Restoration Tracking System User's Guide, U.S. Army Environmental Center, Sep 94.
- b. The DSERTS Army Guidance Manual, U.S. Army Environmental Center, Sep 94.
- 6. Memorandum, USAEC, SFIM-AEC-IRP, 6 Dec 94, subject: FY95 Guidance for Required Installation Action Plans.
- 7. Relative Risk Site Evaluation Primer, ODUSD (ES), Summer 1994 (Interim Edition).
- 8. Memorandum, USAEC, SFIM-AEC-IRP, 24 May 94, subject: Suggested Memorandum of Agreement (MOA).
- 9. Memorandum, CSIM, DAIM-ED-R, 28 Nov 94, subject: Interim Policy for Staffing Decision Documents (DDs).
- 10a. Memorandum, USAEC, SFIM-AEC-IRB, 18 Apr 94, subject: Guidance for Developing Restoration Advisory Boards.
- b. Restoration Advisory Board Workshop Guidebook; A Strategy for Implementing the Joint Department of Defense and U.S. Environmental Protection Agency Guidelines on Restoration Advisory Boards, Summer 1994.
- c. Department of Defense and United States Environmental Protection Agency Restoration Advisory Board Implementation Guidelines, September 1994.